TSD File Inventory Index

Date: May 14, 2001

Initial: CDM Geneva

Facility Name: Johnson Controls Battery Group, Inc (Ore Hill Site)

Facility Identification Number: ILD 980542 470

A.1 General Correspondence		**B.2 Permit Docket (B.1.2)**	
A.2 Part A / Interim Status		.1 Correspondence	
.1 Correspondence	✓	.2 All Other Permitting Documents (Not Part of the ARA)	
.2 Notification and Acknowledgment	✓	**C.1 Compliance - (Inspection Reports)**	✓
.3 Part A Application and Amendments	✓	**C.2 Compliance/Enforcement**	✓
.4 Financial Insurance (Sudden, Non Sudden)		.1 Land Disposal Restriction Notifications	
.5 Change Under Interim Status Requests		.2 Import/Export Notifications	
.6 Annual and Biennial Reports		**C.3 FOIA Exemptions - Non-Releasable Documents**	
A.3 Groundwater Monitoring		**D.1 Corrective Action/Facility Assessment**	✓
.1 Correspondence		.1 RFA Correspondence	
.2 Reports		.2 Background Reports, Supporting Docs and Studies	
A.4 Closure/Post Closure		.3 State Prelim. Investigation Memos	
.1 Correspondence	✓	.4 RFA Reports	✓
.2 Closure/Post Closure Plans, Certificates, etc	✓	**D. 2 Corrective Action/Facility Investigation**	
A.5 Ambient Air Monitoring		.1 RFI Correspondence	
.1 Correspondence		.2 RFI Workplan	
.2 Reports		.3 RFI Program Reports and Oversight	
B.1 Administrative Record		.4 RFI Draft /Final Report	

Total = 1

.5 RFI QAPP		.7 Lab data, Soil Sampling/Groundwater
.6 RFI QAPP Correspondence		.8 Progress Reports
.7 Lab Data, Soil Sampling/Groundwater		D.5 Corrective Action/Enforcement
.8 RFI Progress Reports		.1 Administrative Record 3008(h) Order
.9 Interim Measures Correspondence		.2 Other Non-AR Documents
.10 Interim Measures Workplan and Reports		D.6 Environmental Indicator Determinations
D.3 Corrective Action/Remediation Study		.1 Forms/Checklists
.1 CMS Correspondence		E. Boilers and Industrial Furnaces (BIF)
.2 Interim Measures		.1 Correspondence
.3 CMS Workplan		.2 Reports
.4 CMS Draft/Final Report		F Imagery/Special Studies (Videos, photos, disks, maps, blueprints, drawings, and other special materials.)
.5 Stabilization		G.1 Risk Assessment
.6 CMS Progress Reports		.1 Human/Ecological Assessment
.7 Lab Data, Soil Sampling/Groundwater		.2 Compliance and Enforcement
D.4 Corrective Action Remediation Implementation		.3 Enforcement Confidential
.1 CMI Correspondence		.4 Ecological - Administrative Record
.2 CMI Workplan		.5 Permitting
.3 CMI Program Reports and Oversight		.6 Corrective Action Remediation Study
.4 CMI Draft/Final Reports		.7 Corrective Action/Remediation Implementation
.5 CMI QAPP		.8 Endangered Species Act
.6 CMI Correspondence		.9 Environmental Justice

Note: Transmittal Letter to Be Included with Reports.
Comments: Documents do not justify individual folder available!

UNITED STATES
ENVIRONMENTAL PROTECTION AGENCY
REGION 5
RCRA ACTIVITIES
P.O. BOX A3587
CHICAGO, ILLINOIS 60690

Johnson Controls Battery Group
5757 N. Green Bay Ave
Milwaukee, WI 53201

FEB 20 1991

RE: EPA ID #: ILD980502470

In response to your request of 1-8-91 the following information has been updated:

(1) to change company name: JOHNSON CONTROLS Battery Group

(2) contact to: Brad Feamley

If you have any questions, please contact me at (312) 886-6173.

Sincerely,

Sharon Kiddon

Sharon Kiddon
RCRA Notifications Coordinator
Waste Management Division

cc: State Agency
File

(17)

UNITED STATES
ENVIRONMENTAL PROTECTION AGENCY
REGION V
230 SOUTH DEARBORN ST.
CHICAGO, ILLINOIS 60604

REPLY TO ATTENTION OF:
5HW-13

Bradley Fearnley, Process Engineer
Johnson Controls Incorporated - Globe Battery Division
300 S. Glengarry
Geneva, Ill. 60134

RE: Request for Information--Hazardous Waste Permit Review (Recycling)
FACILITY NAME: Johnson Controls Incorporated - Globe Battery Division
U.S. EPA ID NO.: ILD 980 502 470

Dear Mr. Fearnley:

This is to acknowledge that the United States Environmental Protection Agency has completed reviewing your Part A Hazardous Waste Permit Application. Our review indicates your facility may not require a permit under §3005 of the Resource Conservation and Recovery Act, as amended; however, further clarification is needed.

Based on the information submitted, your facility appears to use, re-use, recycle or reclaim its waste, as described in 40 CFR Part 261.6 (enclosed). Please review these requirements to verify that your facility qualifies as a recycler. If it does, a permit is not required, and you should withdraw your permit application. Please submit your determination in writing, signed and certified by an authorized person in accordance with 40 CFR Part 270.11 (enclosed), requesting that your application be withdrawn. If at any time since November 19, 1980, your operation included treatment, storage, or disposal of hazardous waste subject to 40 CFR Part 265, a closure plan must be filed with the withdrawal request. Requirements for closure are found at 40 CFR Part 265, Subpart G (enclosed).

If your review indicates that a permit is required, but certain information on your application is incorrect, please submit a revised Part A with the appropriate changes to this Regional Office. If no response is received in this office within 30 days, we will assume your facility requires a permit. Accordingly, we will continue to process your application.

Please contact the Technical, Permits, and Compliance Section at (312) 353-2197 for assistance, if you have any questions. Please refer to "Request for Information--Recycling," in all correspondence on this matter.

Sincerely yours,

Karl J. Klepitsch, Jr., Chief
Waste Management Branch

Enclosures

cc: Milton C. Zilis, Vice President
Johnson Controls Incorporated -
Globe Battery Division
P.O. Box 591
Milwaukee, WI. 53201

OK DH 11/22/83

UNITED STATES
ENVIRONMENTAL PROTECTION AGENCY
REGION V
111 West Jackson Blvd.
CHICAGO, ILLINOIS 60604

file

REPLY TO ATTENTION OF:
RCRA ACTIVITIES

DEC 8 1982

FEARNLEY BRADLEY PROCESS ENG
JOHNSON CONTROLS INC GLOBE BATTERY
300 S GLENGARRY
GENEVA IL 60134
FACILITY: 300 S GLENGARRY
LOCATION: GENEVA IL 60134
ID NO.: ILT180010316

Dear Applicant:

RE: U.S. EPA Identification Number Change

This is to inform you that the United States Environmental Protection Agency (U.S. EPA) will be changing your temporary (T) identification number to a permanent (D) one. The label below shows your current temporary number as "OLD T NO." and the new permanent number as "NEW D NO."

OLD I.D. NO.: ILT180010316

NEW I.D. NO.: ILD980502470

In order to provide your facility with adequate time to convert to the permanent U.S. EPA identification number, we will make the change in our computer system effective January 1, 1983. This will allow you to use your temporary identification number until the end of the calendar year and, thus, cover all 1982 hazardous waste handled under one number for your annual report.

We have coordinated the identification number change with your State hazardous waste management office. The State has a listing of your old and new numbers.

Please contact Mr. Arthur Kawatachi of my staff at (312) 886-7449, if you have any questions regarding this matter.

Sincerely yours,

Karl J. Klepitsch, Jr., Chief
Waste Management Branch

cc: Facility owner

UNITED STATES
ENVIRONMENTAL PROTECTION AGENCY
REGION V
230 SOUTH DEARBORN ST.
CHICAGO, ILLINOIS 60604

REPLY TO ATTENTION OF:
RCRA ACTIVITIES

MAR 25 1982

Bradley Fearnley
Johnson Controls Inc. Globe Battery Div.
300 S. Glengarry
Geneva, Illinois 60134

RE: Interim Status Acknowledgement USEPA ID No. ILT180010316
FACILITY NAME: Johnson Controls Inc. Globe Battery Div.

Dear Mr. Fearnley:

This is to acknowledge that the U.S. Environmental Protection Agency (USEPA) has completed processing your Part A Hazardous Waste Permit Application. It is the opinion of this office that the information submitted is complete and that you, as an owner or operator of a hazardous waste management facility, have met the requirements of Section 3005(e) of the Resource Conservation and Recovery Act (RCRA) for Interim Status. However, should USEPA obtain information which indicates that your application was incomplete or inaccurate, you may be requested to provide further documentation of your claim for Interim Status. Our opinion will be reevaluated on the basis of this information.

As an owner or operator of a hazardous waste management facility, you are required to comply with the interim status standards as prescribed in 40 CFR Parts 122 and 265, or with State rules and regulations in those States which have been authorized under Section 3006 of RCRA. In addition, you are reminded that operating under interim status does not relieve you from the need to comply with all applicable State and local requirements.

The printout enclosed with this letter identifies the limit(s) of the process design capacities your facility may use during the interim status period. This information was obtained from your Part A Permit application. If you wish to handle new wastes, to change processes, to increase the design capacity of existing processes, or to change ownership or operational control of the facility, you may do so only as provided in 40 CFR Sections 122.22 and 122.23.

As stated in the first paragraph of this letter, you have met the requirements of 40 CFR Part 122.23; your facility may operate under interim status until such time as a permit is issued or denied. This will be preceded by a request from this office or the State (if authorized) for Part B of your application. Please contact Arthur Kawatachi of my staff at (312) 886-7449, if you have any questions concerning this letter or the enclosure.

Sincerely yours,

Karl J. Klepitsch, Jr., Chief
Waste Management Branch

Enclosure

FACILITY NAME	EPA ID NUMBER
JOHNSON CONTROLS INC GLOBE BATTERY DIV	ILT180010316

FACILITY OPERATOR

JOHNSON CONTROLS INC

FACILITY OWNER

JOHNSON CONTROLS INC

FACILITY LOCATION

300 S GLENGARRY
GENEVA IL 60134

PROCESS CODE	DESIGN CAPACITY	UNIT OF MEASURE
S01	10000.00000	G
S02	5000.00000	G
T01	225000.00000	U

KEY

PROCESS	PROCESS CODE	APPROPRIATE UNITS OF MEASURE
STORAGE:		
CONTAINER	S01	G OR L
TANK	S02	G OR L
WASTE PILE	S03	Y OR C
SURFACE IMPOUNDMENT	S04	G OR L
DISPOSAL:		
INJECTION WELL	D79	G,L,U, OR V
LANDFILL	D80	A OR F
LAND APPLICATION	D81	B OR Q
OCEAN DISPOSAL	D82	U OR V
SURFACE IMPOUNDMENT	D83	G OR L
TREATMENT:		
TANK	T01	U OR V
SURFACE IMPOUNDMENT	T02	U OR V
INCINERATOR	T03	D,W,E, OR H
HER	T04	J,R,N,S,U,V

UNIT OF MEASURE	CODE
GALLONS	G
LITERS	L
CUBIC YARDS	Y
CUBIC METERS	C
GALLONS PER DAY	U
LITERS PER DAY	V
TONS PER HOUR	D
METRIC TONS\HOUR	W
GALLONS\HOUR	E
LITERS\HOUR	H
ACRE-FEET	A
HECTARE-METER	F
ACRES	B
HECTARES	Q
POUNDS\HOUR	J
KILOGRAMS\HOUR	R
TONS PER DAY	N
METRIC TONS\DAY	S

Please print or type with ELITE type (12 characters per inch) in the unshaded areas only

Form Approved. OMB No. 2050-0028. Expires 10-30-91
GSA No. 0246-EPA-OT

United States Environmental Protection Agency
Washington, DC 20460

EPA Notification of Hazardous Waste Activity

Please refer to the *Instructions for Filing Notification* before completing this form. The information requested here is required by law (Section 3010 of the Resource Conservation and Recovery Act).

For Official Use Only

Comments

C C

Installation's EPA ID Number | **Approved** | **Date Received (yr. mo.)**

C F: I L D 9 8 0 5 0 2 4 7 0 T/A C 1 | | FEB 20 1991

I. Name of installation

C. J O H N S O N C O N T R O L S B A T T E R Y G R O U P

II. Installation Mailing Address

Street or P.O. Box

C 3: 5 7 5 7 N G R E E N B A Y A V E P O 5 9 1

City or Town | **State** | **ZIP Code**

C 4: M I L W A U K E E | W I | 5 3 2 0 1

2-20-91 cl

III. Location of Installation

Street or Route Number

C 5:

City or Town | **State** | **ZIP Code**

C 6:

IV. Installation Contact

Name and Title *(last, first, and job title)* | **Phone Number** *(area code and number)*

C. C 2: F E A R N L E Y B R A D

V. Ownership

A. Name of Installation's Legal Owner | **B. Type of Ownership** *(enter code)*

C R:

VI. Type of Regulated Waste Activity *(Mark 'X' in the appropriate boxes. Refer to instructions.)*

A. Hazardous Waste Activity

- ☐ 1a. Generator ☐ 1b. Less than 1,000 kg/mo.
- ☐ 2. Transporter
- ☐ 3. Treater/Storer/Disposer
- ☐ 4. Underground Injection
- ☐ 5. Market or Burn Hazardous Waste Fuel *(enter 'X' and mark appropriate boxes below)*
  - ☐ a. Generator Marketing to Burner
  - ☐ b. Other Marketer
  - ☐ c. Burner

B. Used Oil Fuel Activities

- ☐ 6. Off-Specification Used Oil Fuel
  - ☐ a. Generator Marketing to Burner
  - ☐ b. Other Marketer
  - ☐ c. Burner
- ☐ 7. Specification Used Oil Fuel Marketer *(or On site Burner)* Who First Claims the Oil Meets the Specification

VII. Waste Fuel Burning: Type of Combustion Device *(enter 'X' in all appropriate boxes to indicate type of combustion device(s) in which hazardous waste fuel or off-specification used oil fuel is burned. See instructions for definitions of combustion devices.)*

☐ A. Utility Boiler ☐ B. Industrial Boiler ☐ C. Industrial Furnace

VIII. Mode of Transportation *(transporters only - enter 'X' in the appropriate box(es)*

☐ A. Air ☐ B. Rail ☐ C. Highway ☐ D. Water ☐ E. Other *(specify)*

IX. First or Subsequent Notification

Mark 'X' in the appropriate box to indicate whether this is your installation's first notification of hazardous waste activity or a subsequent notification. If this is not your first notification, enter your installation's EPA ID Number in the space provided below.

☐ A. First Notification ☐ B. Subsequent Notification *(complete item C)*

C. Installation's EPA ID Number

ID – For Official Use Only

C														T/A	C
W															1

X. Description of Hazardous Wastes *(continued from front)*

A. Hazardous Wastes from Nonspecific Sources. Enter the four-digit number from 40 CFR Part 261.31 for each listed hazardous waste from nonspecific sources your installation handles. Use additional sheets if necessary.

1	2	3	4	5	6
7	8	9	10	11	12

B. Hazardous Wastes from Specific Sources. Enter the four-digit number from 40 CFR Part 261.32 for each listed hazardous waste from specific sources your installation handles. Use additional sheets if necessary.

13	14	15	16	17	18
19	20	21	22	23	24
25	26	27	28	29	30

C. Commercial Chemical Product Hazardous Wastes. Enter the four-digit number 40 CFR Part 261.33 for each chemical substance your installation handles which may be hazardous waste. Use additional sheets if necessary.

31	32	33	34	35	36
37	38	39	40	41	42
43	44	45	46	47	48

D. Listed Infectious Wastes. Enter the four-digit number 40 CFR Part 261.34 for each hazardous waste from hospitals, veterinary hospitals, or medical and research laboratories your installation handles. Use additional sheets if necessary.

49	50	51	52	53	54

E. Characteristics of Nonlisted Hazardous Wastes. Mark "X" in the boxes corresponding to the characteristics of nonlisted hazardous wastes your installation handles. *(See 40 CFR Parts 261.21 - 261.24)*

☐ 1. Ignitable *(D001)* ☐ 2. Corrosive *(D002)* ☐ 3. Reactive *(D003)* ☐ 4. Toxic *(D000)*

XI. Certification

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this and all attached documents, and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

Signature	Name and Official Title *(type or print)*	Date Signed

Estimated burden: Public reporting burden for this collection of information is estimated to be 3 hours, including time for reviewing instructions, searching existing data sources, gathering and maintaining the data needed, and completing and reviewing the collection of information. Send comments regarding the burden estimate or any other aspect of this collection of information, including suggestions for reducing this burden, to Chief, Information Policy Branch, PM-223, U.S. Environmental Protection Agency, 401 M St., S.W., Washington, D.C. 20460; and to the Office of Information and Regulator Affairs, Office of Management and Budget, Washington, D.C. 20503.

P, A, F.

EPA

ACKNOWLEDGEMENT OF NOTIFICATION OF HAZARDOUS WASTE ACTIVITY
(VERIFICATION)

This is to acknowledge that you have filed a Notification of Hazardous Waste Activity for the installation located at the address shown in the box below to comply with Section 3010 of the Resource Conservation and Recovery Act *(RCRA)*. Your EPA Identification Number for that installation appears in the box below. The EPA Identification Number must be included on all shipping manifests for transporting hazardous wastes; on all Annual Reports that generators of hazardous waste, and owners and operators of hazardous waste treatment, storage and disposal facilities must file with EPA; on all applications for a Federal Hazardous Waste Permit; and other hazardous waste management reports and documents required under Subtitle C of RCRA.

EPA I.D. NUMBER → ILT180010316 REACKNOWLEDGEMENT

JOHNSON CONTROLS INC GLOBE BATTERY DIV
300 S GLENGARRY
GENEVA IL 60134

INSTALLATION ADDRESS →
300 S GLENGARRY
GENEVA IL 60134

EPA Form 8700-12B (4-80)

09/28/81

Please print or type with ELITE type (12 characters/inch) in the unshaded areas only.

Form Approved OMB No. 158-S79016
GSA No. 0246-EPA-OT

EPA — U.S. ENVIRONMENTAL PROTECTION AGENCY
NOTIFICATION OF HAZARDOUS WASTE ACTIVITY

INSTRUCTIONS: If you received a preprinted label, affix it in the space at left. If any of the information on the label is incorrect, draw a line through it and supply the correct information in the appropriate section below. If the label is complete and correct, leave Items I, II, and III below blank. If you did not receive a preprinted label, complete all items. "Installation" means a single site where hazardous waste is generated, treated, stored and/or disposed of, or a transporter's principal place of business. Please refer to the INSTRUCTIONS FOR FILING NOTIFICATION before completing this form. The information requested herein is required by law *(Section 3010 of the Resource Conservation and Recovery Act).*

INSTALLATION'S EPA I.D. NO.: ~~ILT180010316~~ ILD005159850 #42

NAME OF INSTALLATION

II. INSTALLATION MAILING ADDRESS: GLOBE-UNION INC
~~1150 E STATE ST~~ 300 S. GLENGARRY
GENEVA, IL 60134

000202 AUG -4 80

III. LOCATION OF INSTALLATION: ~~1150 E STATE ST~~ 300 S. GLENGARRY
GENEVA, IL 60134

DETACH

FOR OFFICIAL USE ONLY

COMMENTS: C ILD980502470

INSTALLATION'S EPA I.D. NUMBER	APPROVED	DATE RECEIVED (yr., mo., & day)
F ~~ILT180010316~~ T/A C 1	A	800804

I. NAME OF INSTALLATION
JOHNSON CONTROLS INC GLOBE BATTERY DIV.

II. INSTALLATION MAILING ADDRESS
STREET OR P.O. BOX: 3 SAME

CITY OR TOWN: SAME — ST. — ZIP CODE

III. LOCATION OF INSTALLATION
STREET OR ROUTE NUMBER: 5 SAME

CITY OR TOWN: 6 SAME — ST. — ZIP CODE

IV. INSTALLATION CONTACT
NAME AND TITLE (last, first, & job title): 2 FEARNLEY, BRADLEY PROCESS ENGR
PHONE NO. (area code & no.): 312-232-4270

V. OWNERSHIP
A. NAME OF INSTALLATION'S LEGAL OWNER: 8 JOHNSON CONTROLS INC

B. TYPE OF OWNERSHIP (enter the appropriate letter into box): M
F = FEDERAL
M = NON-FEDERAL

VI. TYPE OF HAZARDOUS WASTE ACTIVITY (enter "X" in the appropriate box(es))
- [X] A. GENERATION
- [ ] B. TRANSPORTATION (complete item VII)
- [ ] C. TREAT/STORE/DISPOSE
- [ ] D. UNDERGROUND INJECTION

VII. MODE OF TRANSPORTATION (transporters only – enter "X" in the appropriate box(es))
- [ ] A. AIR
- [ ] B. RAIL
- [ ] C. HIGHWAY
- [ ] D. WATER
- [ ] E. OTHER (specify):

VIII. FIRST OR SUBSEQUENT NOTIFICATION
Mark "X" in the appropriate box to indicate whether this is your installation's first notification of hazardous waste activity or a subsequent notification. If this is not your first notification, enter your Installation's EPA I.D. Number in the space provided below.

~~HT1800010316~~
ILD980502470

- [ ] A. FIRST NOTIFICATION
- [X] B. SUBSEQUENT NOTIFICATION (complete item C)

C. INSTALLATION'S EPA I.D. NO.: ~~I L D 0 0 5 1 5 9 8 5 0~~

IX. DESCRIPTION OF HAZARDOUS WASTES
Please go to the reverse of this form and provide the requested information.

EPA Form 8700-12 (6-80)

AUG 04 1980

CONTINUE ON REVERSE

T 1800 10316

I.D. – FOR OFFICIAL USE ONLY

S.													T/A	C
W	I	L	D	0	0	5	1	5	9	8	5	0	2	1
1	2											13	14	15

IX. DESCRIPTION OF HAZARDOUS WASTES *(continued from front)*

A. HAZARDOUS WASTES FROM NON–SPECIFIC SOURCES. Enter the four–digit number from 40 CFR Part 261.31 for each listed hazardous waste from non–specific sources your installation handles. Use additional sheets if necessary.

1	2	3	4	5	6
7	8	9	10	11	12

B. HAZARDOUS WASTES FROM SPECIFIC SOURCES. Enter the four–digit number from 40 CFR Part 261.32 for each listed hazardous waste from specific industrial sources your installation handles. Use additional sheets if necessary.

13	14	15	16	17	18
19	20	21	22	23	24
25	26	27	28	29	30

C. COMMERCIAL CHEMICAL PRODUCT HAZARDOUS WASTES. Enter the four–digit number from 40 CFR Part 261.33 for each chemical substance your installation handles which may be a hazardous waste. Use additional sheets if necessary.

31	32	33	34	35	36
37	38	39	40	41	42
43	44	45	46	47	48

D. LISTED INFECTIOUS WASTES. Enter the four–digit number from 40 CFR Part 261.34 for each listed hazardous waste from hospitals, veterinary hospitals, medical and research laboratories your installation handles. Use additional sheets if necessary.

49	50	51	52	53	54

E. CHARACTERISTICS OF NON–LISTED HAZARDOUS WASTES. Mark "X" in the boxes corresponding to the characteristics of non–listed hazardous wastes your installation handles. *(See 40 CFR Parts 261.21 – 261.24.)*

☐ 1. IGNITABLE (D001) ☐ 2. CORROSIVE (D002) ☐ 3. REACTIVE (D003) ☒ 4. TOXIC (D000)

X. CERTIFICATION

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this and all attached documents, and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

SIGNATURE	NAME & OFFICIAL TITLE *(type or print)*	DATE SIGNED
	PLANT MANAGER	7/28/80

EPA Form 8700-12 (6-80) REVERSE

CERTIFICATION REGARDING POTENTIAL RELEASES FROM
SOLID WASTE MANAGEMENT UNITS

FACILITY NAME: Johnson Controls, Inc. - Battery Division

EPA I.D. NUMBER: ILD 980502470

LOCATION CITY: 300 S. Glengarry Geneva

STATE: IL 60134

1. Are there any of the following solid waste management units (existing or closed) at your facility? NOTE - DO NOT INCLUDE HAZARDOUS WASTE UNITS CURRENTLY SHOWN IN YOUR PART A APPLICATION

	YES	NO
° Landfill		
° Surface Impoundment		
° Land Farm		
° Waste Pile		
° Incinerator		
° Storage Tank (Above Ground)		
° Storage Tank (Underground)		
° Container Storage Area		
° Injection Wells		
° Wastewater Treatment Units	X	
° Transfer Stations		
° Waste Recycling Operations		
° Waste Treatment, Detoxification		
° Other prior releases	X	

2. If there are "Yes" answers to any of the items in Number 1 above, please provide a description of the wastes that were stored, treated or disposed of in each unit. In particular, please focus on whether or not the wastes would be considered as hazardous wastes or hazardous constituents under RCRA. Also include any available data on quantities or volume of wastes disposed of and the dates of disposal. Please also provide a description of each unit and include capacity, dimensions and location at facility. Provide a site plan if available.

See attached "Notifications of Hazardous Waste Site" and site plan regarding prior releases. Wastewater treatment system used to treat process waste waters. Effluent discharge to city of Geneva.

NOTE: Hazardous wastes are those identified in 40 CFR 261. Hazardous constituents are those listed in Appendix VIII of 40 CFR Part 261.

3. For the units noted in Number 1 above and also those hazardous waste units in your Part A application, please describe for each unit any data available on any prior or current releases of hazardous wastes or constituents to the environment that may have occurred in the past or may still be occurring.

   Please provide the following information

   a. Date of release
   b. Type of waste released
   c. Quantity or volume of waste released
   d. Describe nature of release (i.e., spill, overflow, ruptured pipe or tank, etc.)

   See attached

4. In regard to the prior or continuing releases described in Number 3 above, please provide (for each unit) any analytical data that may be available which would describe the nature and extent of environmental contamination that exists as a result of such releases. Please focus on concentrations of hazardous wastes or constituents present in contaminated soil or groundwater.

   None available

I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the submittal is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations. (42 U.S.C. 6902 et seq. and 40 CFR 270.11(d))

J. R. Meverden, Mgr. Env. Control
Typed Name and Title

Signature

5/8/86
Date

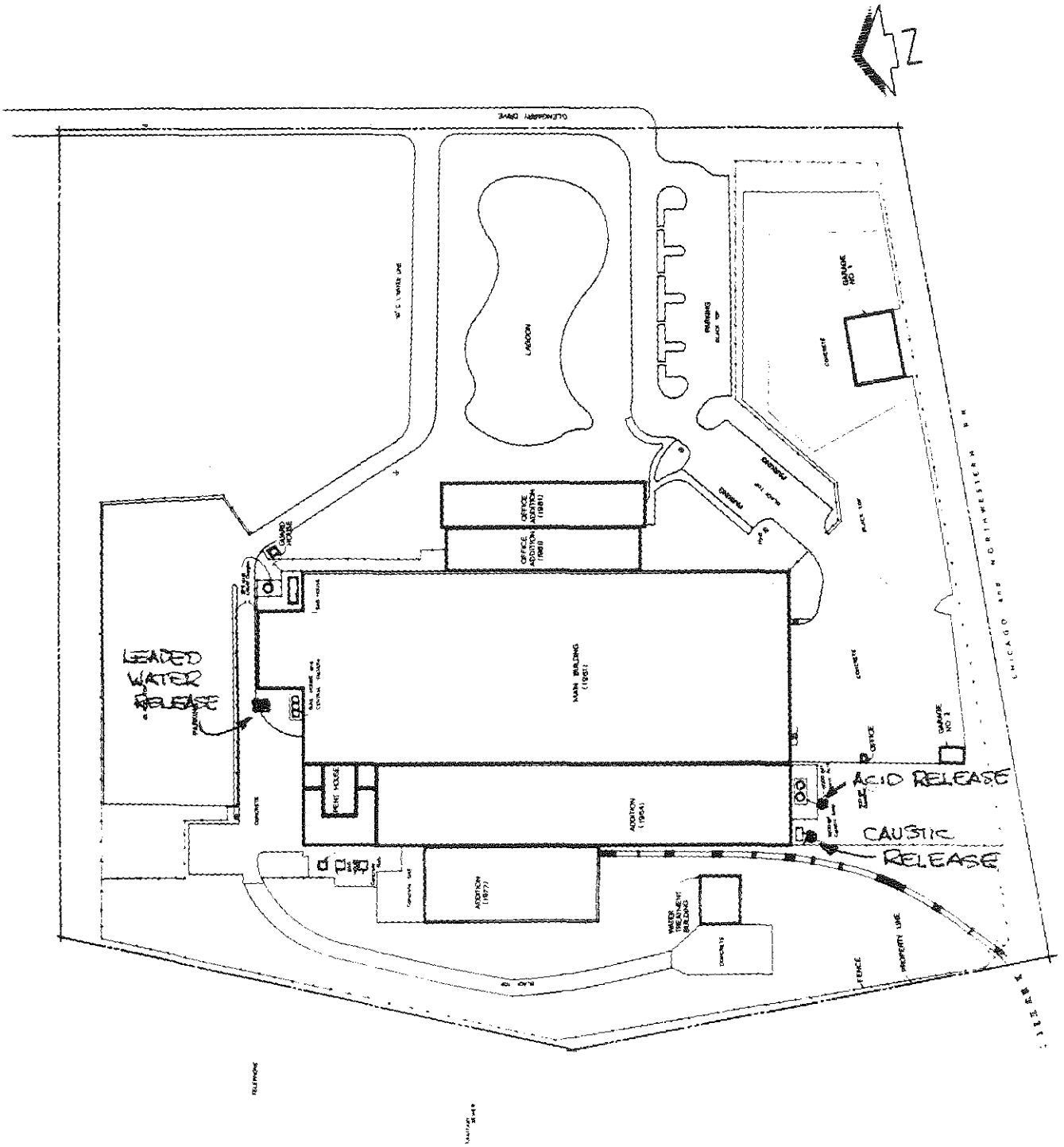
JOHNSON CONTROLS

FACILITY PROFILES

SITE PLAN

PAGE: I.F.2
DATE: 3-15-83

FACILITY: GENEVA, IL



EPA Notification of Hazardous Waste Site

United States
Environmental Protection
Agency
Washington DC 20460

This initial notification information is required by Section 103(c) of the Comprehensive Environmental Response, Compensation, and Liability Act of 1980 and must be mailed by June 9, 1981.

Please type or print in ink. If you need additional space, use separate sheets of paper. Indicate the letter of the item which applies.

A Person Required to Notify:

Enter the name and address of the person or organization required to notify

Name: JOHNSON CONTROLS, INC.
Street: 5757 North Green Bay Avenue
City: Glendale State: WI Zip Code: 53209

B Site Location:

Enter the common name (if known) and actual location of the site.

Name of Site: Globe-Union
Street: 1150 E. State Street
City: Geneva County: Kane State: IL Zip Code: 60134

C Person to Contact:

Enter the name, title (if applicable), and business telephone number of the person to contact regarding information submitted on this form.

Name (Last, First and Title): Robert Nicolai
Phone: (414) 228-2452

D Dates of Waste Handling:

Enter the years that you estimate waste treatment, storage, or disposal began and ended at the site.

From (Year): 1965 To (Year): 1981

E Waste Type: Choose the option you prefer to complete

Option 1: Select general waste types and source categories. If you do not know the general waste types or sources, you are encouraged to describe the site in Item F—Description of Site.

General Type of Waste:
Place an X in the appropriate boxes. The categories listed overlap. Check each applicable category.

1. ☐ Organics
2. ☐ Inorganics
3. ☐ Solvents
4. ☐ Pesticides
5. ☐ Heavy metals
6. ☒ Acids
7. ☐ Bases See below
8. ☐ PCBs
9. ☐ Mixed/Municipal Waste
10. ☐ Unknown
11. ☐ Other (Specify)

6. Sulphuric Acid

Source of Waste:
Place an X in the appropriate boxes

1. ☐ Mining
2. ☐ Construction
3. ☐ Textiles
4. ☐ Fertilizer
5. ☐ Paper/Printing
6. ☐ Leather Tanning
7. ☐ Iron/Steel Foundry
8. ☐ Chemical, General
9. ☐ Plating/Polishing
10. ☐ Military Ammunition
11. ☐ Electrical Conductors
12. ☐ Transformers
13. ☐ Utility Companies
14. ☐ Sanitary/Refuse
15. ☐ Photofinish
16. ☐ Lab/Hospital
17. ☐ Unknown
18. ☐ Other (Specify)

Option 2: This option is available to persons familiar with the Resource Conservation and Recovery Act (RCRA) Section 3001 regulations (40 CFR Part 261).

Specific Type of Waste:
EPA has assigned a four-digit number to each hazardous waste listed in the regulations under Section 3001 of RCRA. Enter the appropriate four-digit number in the boxes provided. A copy of the list of hazardous wastes and codes can be obtained by contacting the EPA Region serving the State in which the site is located.

Notification of Hazardous Waste Site — Side Two

F Waste Quantity

Place an X in the appropriate boxes to indicate the facility types found at the site.

In the "total facility waste amount" space give the estimated combined quantity (volume) of hazardous wastes at the site using cubic feet or gallons.

In the "total facility area" space, give the estimated area size which the facilities occupy using square feet or acres.

Facility Type

1. ☐ Piles
2. ☐ Land Treatment
3. ☐ Landfill
4. ☐ Tanks
5. ☐ Impoundment
6. ☐ Underground Injection
7. ☐ Drums, Above Ground
8. ☐ Drums, Below Ground
9. ☒ Other (Specify) See below

Total Facility Waste Amount

cubic feet

gallons Unknown (see below)

Total Facility Area

square feet

acres less than .1 acre

G Known, Suspected or Likely Releases to the Environment:

Place an X in the appropriate boxes to indicate any known, suspected, or likely releases of wastes to the environment.

☐ Known ☐ Suspected ☐ Likely ☐ None

Unknown.

Note: Items H and I are optional. Completing these items will assist EPA and State and local governments in locating and assessing hazardous waste sites. Although completing the items is not required, you are encouraged to do so.

H Sketch Map of Site Location: (Optional)

Sketch a map showing streets, highways, routes or other prominent landmarks near the site. Place an X on the map to indicate the site location. Draw an arrow showing the direction north. You may substitute a publishing map showing the site location.

I Description of Site: (Optional)

Describe the history and present conditions of the site. Give directions to the site and describe any nearby wells, springs, lakes, or housing. Include such information as how waste was disposed and where the waste came from. Provide any other information or comments which may help describe the site conditions.

From 1965 to 1981 occassional spills (up to 700 gallons at a time) of sulphuric acid were had in the truck yard. These were neutralized and clean up procedures were instituted.

J Signature and Title:

The person or authorized representative (such as plant managers, superintendents, trustees or attorneys) of persons required to notify must sign the form and provide a mailing address (if different than address in item A). For other persons providing notification, the signature is optional. Check the boxes which best describe the relationship to the site of the person required to notify. If you are not required to notify check "Other".

Name JOHNSON CONTROLS, INC.

Street 5757 N. Green Bay Avenue

City Glendale State WI Zip Code 53209

Signature Milton Zilis Date 6/8/81

☒ Owner, Present
☐ Owner, Past
☐ Transporter
☐ Operator, Present
☐ Operator, Past
☐ Other

[illegible]

[illegible]

EPA Notification of Hazardous Waste Site

United States
Environmental Protection
Agency
Washington DC 20460

This initial notification information is required by Section 103(c) of the Comprehensive Environmental Response, Compensation, and Liability Act of 1980 and must be mailed by June 9, 1981.

Please type or print in ink. If you need additional space, use separate sheets of paper. Indicate the letter of the item which applies.

A Person Required to Notify:

Enter the name and address of the person or organization required to notify.

Name: JOHNSON CONTROLS, INC.

Street: 5757 North Green Bay Avenue

City: Glendale State: WI Zip Code: 53209

B Site Location:

Enter the common name (if known) and actual location of the site.

Name of Site: Globe-Union

Street: 1150 E. State Street

City: Geneva County: Kane State: IL Zip Code: 60134

C Person to Contact:

Enter the name, title (if applicable), and business telephone number of the person to contact regarding information submitted on this form.

Name (Last, First and Title): Robert Nicolai

Phone: (414) 228-2452

D Dates of Waste Handling:

Enter the years that you estimate waste treatment, storage, or disposal began and ended at the site.

From (Year): 1965 To (Year): 1980

E Waste Type: Choose the option you prefer to complete

Option 1: Select general waste types and source categories. If you do not know the general waste types or sources, you are encouraged to describe the site in Item F—Description of Site.

General Type of Waste:
Place an X in the appropriate boxes. The categories listed overlap. Check each applicable category.

1. ☐ Organics
2. ☐ Inorganics
3. ☐ Solvents
4. ☐ Pesticides
5. ☐ Heavy metals
6. ☐ Acids
7. ☐ Bases
8. ☐ PCBs
9. ☐ Mixed Municipal Waste
10. ☐ Unknown
11. ☐ Other (Specify)

Source of Waste:
Place an X in the appropriate boxes

1. ☐ Mining
2. ☐ Construction
3. ☐ Textiles
4. ☐ Fertilizer
5. ☐ Paper/Printing
6. ☐ Leather Tanning
7. ☐ Iron/Steel Foundry
8. ☐ Chemical (General)
9. ☐ Plating/Polishing
10. ☐ Military Ammunition
11. ☐ Electrical Conductors
12. ☐ Transformers
13. ☐ Utility Companies
14. ☐ Sanitary Waste
15. ☐ Photo Industry
16. ☐ Lab/Hospital
17. ☐ Unknown
18. ☐ Other (Specify)

Option 2: This option is available to persons familiar with the Resource Conservation and Recovery Act (RCRA) Section 3001 regulations (40 CFR Part 261).

Specific Type of Waste:
EPA has assigned a four-digit number to each hazardous waste listed in the regulations under Section 3001 of RCRA. Enter the appropriate four digit number in the boxes provided. A copy of the list of hazardous wastes and codes can be obtained by contacting the EPA Region serving the State in which the site is located.

D008

Location of Hazardous Waste Site — Side Two

Waste Quantity

Place an X in the appropriate boxes to indicate the facility types found at the site.

In the "total facility waste amount" space give the estimated combined quantity (volume) of hazardous wastes at the site using cubic feet or gallons.

In the "total facility area" space, give the estimated area size which the facilities occupy using square feet or acres.

Facility Type

1. ☐ Piles
2. ☐ Land Treatment
3. ☐ Landfill
4. ☐ Tanks
5. ☐ Impoundment
6. ☐ Underground Injection
7. ☐ Drums, Above Ground
8. ☐ Drums, Below Ground
9. ☒ Other (Specify) See below

Total Facility Waste Amount

cubic feet

gallons see below

Total Facility Area

square feet 1,200

acres

G Known, Suspected or Likely Releases to the Environment:

Place an X in the appropriate boxes to indicate any known, suspected, or likely releases of wastes to the environment.

☐ Known ☐ Suspected ☐ Likely ☐ None
UNKNOWN

Note: Items H and I are optional. Completing these items will assist EPA and State and local governments in locating and assessing hazardous waste sites. Although completing the items is not required, you are encouraged to do so.

H Sketch Map of Site Location: (Optional)

Sketch a map showing streets, highways, routes or other prominent landmarks near the site. Place an X on the map to indicate the site location. Draw an arrow showing the direction north. You may substitute a publishing map showing the site location.

I Description of Site: (Optional)

Describe the history and present conditions of the site. Give directions to the site and describe any nearby wells, springs, lakes, or housing. Include such information as how waste was disposed and where the waste came from. Provide any other information or comments which may help describe the site conditions.

Several thousand gallons of excess lead oxide water was pumped out in the last ten (10) to fifteen (15) years. The concentration of lead in the water is unknown but is being estimated to be 5 ppm for reporting purposes.

J Signature and Title

The person or authorized representative (such as plant manager, superintendent, trustee or attorney) of persons required to notify must sign the form and provide a mailing address (if different than item A). For other persons providing notification, this signature is optional. Check the boxes which best describe the relationship of the site of the person required to notify. If you are not required to notify, check "Other".

Name Johnson Controls, Inc. ☒ Owner, Present ☐ Owner, Past ☐ Transporter ☐ Operator, Present ☐ Operator, Past ☐ Other

Street 5757 North Green Bay Ave.

City Glendale State WI Zip 53209

Signature Milton Zilis Date 6/8/81

EPA Notification of Hazardous Waste Site

United States
Environmental Protection
Agency
Washington DC 20460

Initial notification information is required by Section 103(c) of the Comprehensive Environmental Response, Compensation, and Liability Act of 1980 and must be mailed by June 9, 1981.

Please type or print in ink. If you need additional space, use separate sheets of paper. Indicate the letter of the item which applies.

A Person Required to Notify:

Enter the name and address of the person or organization required to notify.

Name: JOHNSON CONTROLS, INC.
Street: 5757 North Green Bay Avenue
City: Glendale State: WI Zip Code: 53209

B Site Location:

Enter the common name (if known) and actual location of the site.

Name of Site: Globe-Union
Street: 1150 E. State Street
City: Geneva County: Kane State: IL Zip Code: 60134

C Person to Contact:

Enter the name, title (if applicable), and business telephone number of the person to contact regarding information submitted on this form.

Name (Last, First, and Title): Robert Nicolai
Phone: (414) 228-2452

D Dates of Waste Handling:

Enter the year that you estimate waste treatment, storage, or disposal began and ended at the site.

From (Year): To (Year): Approximately 1977

E Waste Type: Choose the option you prefer to complete

Option 1: Select general waste types and source categories. If you do not know the general waste types or sources, you are encouraged to describe the site in Item I—Description of Site.

General Type of Waste:
Place an X in the appropriate boxes. The categories listed overlap. Check each applicable category.

1. ☐ Organics
2. ☐ Inorganics
3. ☐ Solvents
4. ☐ Pesticides
5. ☐ Heavy metals
6. ☐ Acids
7. ☒ Bases (See below)
8. ☐ PCBs
9. ☐ Mixed Municipal Waste
10. ☐ Unknown
11. ☐ Other (Specify)

~~ferrous sulfite / caustic soda~~

Source of Waste:
Place an X in the appropriate boxes.

1. ☐ Mining
2. ☐ Construction
3. ☐ Textiles
4. ☐ Fertilizer
5. ☐ Paper/Printing
6. ☐ Leather Tanning
7. ☐ Iron/Steel Foundry
8. ☐ Chemical (General)
9. ☐ Plating/Polishing
10. ☐ Military Ammunition
11. ☐ Electrical Conductors
12. ☐ Transformer
13. ☐ Utility Companies
14. ☐ Sanitary/Refuse
15. ☐ Photofinish
16. ☐ Lab/Hospital
17. ☐ Unknown
18. ☐ Other (Specify)

Option 2: This option is available to persons familiar with the Resource Conservation and Recovery Act (RCRA) Section 3001 regulations (40 CFR Part 261).

Specific Type of Waste:
EPA has assigned a four-digit number to each hazardous waste listed in the regulations under Section 3001 of RCRA. Enter the appropriate four-digit number in the boxes provided. A copy of the list of hazardous wastes and codes can be obtained by contacting the EPA Region serving the State in which the site is located.

Notification of Hazardous Waste Site — Side Two

F Waste Quantity

Place an X in the appropriate boxes to indicate the facility types found at the site.

In the "total facility waste amount" space give the estimated combined quantity (volume) of hazardous wastes at the site using cubic feet or gallons.

In the "total facility area" space, give the estimated area size which the facilities occupy using square feet or acres.

Facility Type

1 ☐ Piles
2 ☐ Land Treatment
3 ☐ Landfill
4. ☐ Tanks
5 ☐ Impoundment
6 ☐ Underground Injection
7. ☐ Drums, Above Ground
8. ☐ Drums, Below Ground
9. ☒ Other (Specify) See below

Total Facility Waste Amount

cubic feet

gallons 200 (estimated)

Total Facility Area

square feet 500 (estimated)

acres

G Known, Suspected or Likely Releases to the Environment:

Place an X in the appropriate boxes to indicate any known, suspected, or likely releases of wastes to the environment.

☐ Known ☐ Suspected ☐ Likely ☒ None Known

Note: Items H and I are optional. Completing these items will assist EPA and State and local governments in locating and assessing hazardous waste sites. Although completing the items is not required, you are encouraged to do so.

H Sketch Map of Site Location: (Optional)

Sketch a map showing streets, highways, routes or other prominent landmarks near the site. Place an X on the map to indicate the site location. Draw an arrow showing the direction north. You may substitute a publishing map showing the site location.

I Description of Site: (Optional)

Describe the history and present conditions of the site. Give directions to the site and describe any nearby wells, springs, lakes, or housing. Include such information as how waste was disposed and where the waste came from. Provide any other information or comments which may help describe the site conditions.

Caustic material spilled, however, the vegatation in the area has recovered indicating full recovery.

J Signature and Title:

The person or authorized representative (such as plant managers, superintendents, trustees or attorneys) of persons required to notify must sign the form and provide a mailing address (if different than address in item A). For other persons providing notification, the signature is optional. Check the boxes which best describe the relationship to the site of the person required to notify. If you are not required to notify check "Other".

Name JOHNSON CONTROLS, INC.

Street 5757 N. Green Bay Avenue

City Glendale State WI Zip Code 53209

Signature ______ Date 6/8/81

Milton Zilis

☒ Owner, Present
☐ Owner, Past
☐ Transporter
☐ Operator, Present
☐ Operator, Past
☐ Other

[FR Doc. 81-11496 Filed 4-14-81; 8:45 am]

BILLING CODE 6560-26-C

A473

cc: Maywood

Johnson Controls, Inc.
Battery Group
5757 N. Green Bay Avenue
Post Office Box 591
Milwaukee, WI 53201-0591
Tel. 414/228 1200

JOHNSON CONTROLS

Mr. Lawrence W. Eastep
Manager Permit Section
Illinois Environmental
Protection Agency
Division of Land
Pollution Control
PO Box 19276
Springfield, IL 62794-9276

November 30, 1992

Subject: Geneva Facility Status Change
ILD980052470

Dear Mr. Eastep:

In earlier communications, there has been discussion relative to the proper handling of waste materials and whether or not Johnson Controls Battery Group, Inc. has met the Waste Management Regulations.

You expressed concern that JCBGI had stored material more than the allowable 90 days before sending offsite for proper treatment and disposal.

When filing an amended Part A, JCBGI did not know which direction the TSDF rules covering wastewater treatment would take. In that the WWT system is classified as a totallly enclosed system and regulations apply to end of pipe and not the operations, we should have requested withdrawal earlier.

Under the original wastewater treatment operation, JCBGI did not use a filter press to remove the excess water and the liquid was put into holding tanks for shipment to Envirite for treatment and disposal. Unfortunately the liquid was not always removed from the property in a timely fashion.

JCBGI has now installed a filter press as the last function in the WWT. The dried sludge is now sent to a smelter for metal recovery. The water from the press is recycled and reused within the plant.

With these correction, no waste is stored for more than the allowable 90 days.

In light of these improvements, JCBGI respectfully submits a revised Part A for your consideration.

Hopefully you will agree with our request and grant a status change to that of Generator only.

If you have any questions or wish to discuss the subject further, please contact me 1-800-333-2222 x2452.

Sincerely,

Johnson Controls Battery Group, Inc.

Jordan S. Harwood P.E.
Manager Environmental Control

cc: B. Fearnley
M. Meves

Please print or type with ELITE type (12 characters per inch) in the unshaded areas only

Form Approved. OMB No. 2050-0028. Expires 10-31-91
GSA No. 0246-EPA-OT

Please refer to the *Instructions for Filing Notification* before completing this form. The information requested here is required by law (*Section 3010 of the Resource Conservation and Recovery Act*).

EPA Notification of Regulated Waste Activity

United States Environmental Protection Agency

Date Received (For Official Use Only)

I. Installation's EPA ID Number (*Mark 'X' in the appropriate box*)

[ ] A. First Notification [X] B. Subsequent Notification (*complete item C*)

C. Installation's EPA ID Number: ILD980052470

II. Name of Installation (*Include company and specific site name*)

JOHNSON CONTROLS BATTERY GROUP

III. Location of Installation (*Physical address not P.O. Box or Route Number*)

Street: 300 GLENGARRY DRIVE

Street (continued):

City or Town: GENEVA | State: IL | ZIP Code: 60134-

County Code: | County Name: KANE

IV. Installation Mailing Address (*See Instructions*)

Street or P.O. Box:

City or Town: | State: | ZIP Code: -

V. Installation Contact (*Person to be contacted regarding waste activities at site*)

Name (*last*): MEVES (*first*): MICHAEL

Job Title: ENV. SPECIALIST | Phone Number (*area code and number*): 708-232-4270

VI. Installation Contact Address (*See Instructions*)

A. Contact Address Location: X Mailing: X

B. Street or P.O. Box:

City or Town: | State: | ZIP Code: -

VII. Ownership (*See Instructions*)

A. Name of Installation's Legal Owner: JOHNSON CONTROLS BATTERY GROUP

Street, P.O. Box, or Route Number: P.O. BOX 591

City or Town: MILWAUKEE | State: WI | ZIP Code: 53201-0591

Phone Number (*area code and number*): 414-228-2452

B. Land Type: P | C. Owner Type: P | D. Change of Owner Indicator: Yes [ ] No [X] | (Date Changed) Month Day Year:

ID - For Official Use Only

VIII. Type of Regulated Waste Activity (*Mark 'X' in the appropriate boxes. Refer to instructions.*)

A. Hazardous Waste Activity

1. Generator (See instructions)
   - [X] a. Greater than 1000kg/mo (2,200 lbs.)
   - [ ] b. 100 to 1000 kg/mo (220 - 2,200 lbs.)
   - [ ] c. Less than 100 kg/mo (220 lbs.)

2. Transporter (Indicate Mode in boxes 1-5 below)
   - [ ] a. For own waste only
   - [ ] b. For commercial purposes

   Mode of Transportation
   - [ ] 1. Air
   - [ ] 2. Rail
   - [ ] 3. Highway
   - [ ] 4. Water
   - [ ] 5. Other - specify

3. [ ] Treater, Storer, Disposer (at installation) Note: A permit is required for this activity; see instructions.

4. Hazardous Waste Fuel
   - [ ] a. Generator Marketing to Burner
   - [ ] b. Other Marketers
   - [ ] c. Burner - indicate device(s) - Type of Combustion Device
     - [ ] 1. Utility Boiler
     - [ ] 2. Industrial Boiler
     - [ ] 3. Industrial Furnace

5. [ ] Underground Injection Control

B. Used Oil Fuel Activities

1. Off-Specification Used Oil Fuel
   - [ ] a. Generator Marketing to Burner
   - [ ] b. Other Marketer
   - [ ] c. Burner - indicate device(s) - Type of Combustion Device
     - [ ] 1. Utility Boiler
     - [ ] 2. Industrial Boiler
     - [ ] 3. Industrial Furnace

2. [ ] Specification Used Oil Fuel Marketer (or On-site Burner) Who First Claims the Oil Meets the Specification

IX. Description of Regulated Wastes (*Use additional sheets if necessary*)

A. Characteristics of Nonlisted Hazardous Wastes. Mark 'X' in the boxes corresponding to the characteristics of nonlisted hazardous wastes your installation handles. *(See 40 CFR Parts 261.20 - 261.24)*

1. Ignitable (D001)	2. Corrosive (D002)	3. Reactive (D003)	4. EP Toxic (D000)	(List specific EPA hazardous waste number(s) for the EP Toxic contaminant(s))
[ ]	[X]	[ ]	[X]	D008

B. Listed Hazardous Wastes. (See 40 CFR 261.31 - 33. See instructions if you need to list more than 12 waste codes.)

1	2	3	4	5	6
7	**8**	**9**	**10**	**11**	**12**

C. Other Wastes. (State or other wastes requiring an I.D. number. See instructions.)

1	2	3	4	5	6

X. Certification

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this and all attached documents, and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fines and imprisonment.

Signature	Name and Official Title *(type or print)*	Date Signed
Jordan S. Harwood	Jordan S. Harwood, Mgr. Env. Control	11-30-92

XI. Comments

Note: Mail completed form to the appropriate EPA Regional or State Office. (See Section III of the booklet for addresses.)

Illinois Environmental Protection Agency · P. O. Box 19276, Springfield, IL 62794-9276

217/782-6762

Refer to: 0890350005 -- Kane County
Johnson Controls - Globe Battery Division
ILD980052470
RCRA Permit
Log No. A211

January 27, 1992

Johnson Controls
Attn: Michael Meves
300 Glengarry Drive
Geneva, Illinois 60134

Dear Mr. Meves:

This is in response to your letter dated September 26, 1991, regarding the Johnson Controls facility located at 300 Glengarry Drive in Geneva, Illinois. The subject of that letter was to explain why the aforementioned facility should still be able to withdraw their RCRA Part A application.

The corresponding wastes and comments from the Agency are listed below:

1. The wastewater treatment sludge shipped off-site between June 14, 1983 and August 16, 1985 appears to have been disposed as a non-hazardous waste, as it was disposed at a non-hazardous waste landfill. Information should be provided to demonstrate why a decision was made to begin disposing of the ferric oxide waste as a non-hazardous waste after June 3, 1983 and then begin disposing of the material as a hazardous waste again on August 16, 1985.

   Under the original Part A permit application submitted on November 19, 1980, the facility was allowed to store S01 - 10,000 gallons, T01 - 225,000 gallons/day, and S02 - 5,000 gallons. In a revised permit application submitted February 7, 1984, the T01 was omitted. Additional information regarding the T01 unit, including justification for removing it from the Part A must be submitted prior to the Agency approving this revised permit modification.

2. Chlorinated Solvents - By reviewing annual hazardous waste generator reports, it appears as though this waste was mistakenly identified during the manifest search as being generated at the subject facility.

3. Ferric Oxide/D002 Waste - If one refers to the second page of your letter under Item 3 and references the manifest search we both have, the Waste Water Treatment Sludge was stored well in excess of 90 days on a number of occasions. It shall be noted that the Wastewater Treatment Sludge or D002 hazardous waste as stated in your letter should be identified as D008 waste. Nevertheless, the manifest search indicates that this waste was stored on-site for more than ninety days.

Based upon a review of the files, including the above information, it appears as though the subject facility is indeed subject to the requirements of 35 Ill. Adm. Code 702, 703, 705, 724 and 725 regarding the storage of hazardous waste in containers and tanks on-site for time periods greater than ninety (90) days and is indeed subject to the RCRA interim status storage facility regulations. As such, the Part A withdrawal request submitted for this facility is denied. According to 35 Ill. Adm. Code 703.157(g), any interim status that may exist for this facility will terminate on November 8, 1992. Therefore, a closure plan meeting the requirements of 35 Ill. Adm. Code 725, Subpart G must be submitted to IEPA by May 8, 1992 for the hazardous waste container storage area and the hazardous waste storage tank at this facility. Guidance for the development of this plan is included for your convenience. In regards to the omission of the T01 storage in the Part A submitted, the Agency would like more information concerning the T01 unit, including justification for removing from the Part A. Information pertaining to this T01 unit should be included in the closure plan.

If you have any questions regarding this letter, please contact William T. Sinnott, II at 217/782-6762

Very truly yours,

Lawrence W. Eastep, P.E., Manager
Permit Section
Division of Land Pollution Control

ALO
LWE:WTS:jar/3234q,89-90

Enclosure

cc: Division File
Maywood Region
USEPA, Region V, George Hamper
USEPA, Region V, Jane Radcliff
Reporting and Planning Section
Glenn Savage
Division of Legal Counsel
William T. Sinnott, II

U.S EPA

Illinois Environmental Protection Agency · P. O. Box 19276, Springfield, IL 62794-9276

217/782-6762

Refer to: 0890350005 -- Kane County
Johnson Controls - Globe Battery Division
ILD980052470 010 316
T1 RCRA Permit
Log No. A211

July 1, 1991

Johnson Controls
Attn: J.R. Meverden
300 Glengarry Drive
Geneva, Illinois 60134

Dear Mr. Meverden:

This is in response to your letter of May 2, 1988 regarding the Johnson Controls facility located at 300 Glengarry Drive in Geneva, Illinois. The subject of this letter was to request withdrawal of the RCRA Part A application submitted for this facility.

The Agency has reviewed its files and found that the history of this site as it pertains to the RCRA program is as follows:

1. Under the original Part A permit application filed on November 19, 1980, the facility was allowed to store S01 - 10,000 gallons, T01 - 225,000 gallons/day, and S02 - 5,000 gallons. In a revised permit application submitted February 7, 1984, the T01 was omitted.

2. According to a review of the manifests associated with wastes sent off-site by Johnson Controls, it appears as though wastes were stored more than ninety (90) days on the following occasions. (Note: S01 = storage in containers; S02 = storage in tanks.)

Waste Name	Time Period During Which Waste Was Apparently Stored More Than 90 Days	Unit Where Managed
Chlorinated Solvent	09/10/84 - 03/26/85	S01
Ferric Oxide	06/14/83 - 08/16/85	S02
Chlorinated Solvent	03/26/85 - 10/14/85	S01
Chlorinated Solvent	12/04/85 - 11/20/86	S01
D002 Waste	10/31/86 - 03/27/87	S02
D002 Waste	06/09/87 - 10/15/87	S02
D002 Waste	10/15/87 - 02/12/88	S02

Based upon a review of the files, including the above information, it appears as though the subject facility is indeed subject to the requirements of 35 Ill. Adm. Code 702, 703, 705, 724 and 725 regarding the storage of hazardous waste in containers and tanks on-site for time periods greater than ninety (90) days and is indeed a RCRA interim status storage facility. As such, the Part A withdrawal request submitted for this facility is denied. According to 35 Ill. Adm. Code 703.157(g), interim status for this facility will terminate on November 8, 1992. Therefore, a closure plan meeting the requirements of 35 Ill. Adm. Code 725, Subpart G must be submitted to IEPA by May 8, 1992 for the hazardous waste container storage area and the hazardous waste storage tank at this facility. Guidance for the development of this plan is included for your convenience. In regards to the omission of the T01 storage in the Part A submitted, the Agency would like more information concerning the T01 unit, including justification for removing from the Part A. Information pertaining to this T01 unit should be included in the closure plan..

If you have any questions regarding this letter, please contact William T. Sinnott II at 217/782-9298.

Very truly yours,

Lawrence W. Eastep, P.E., Manager
Permit Section
Division of Land Pollution Control

LWE:WTS:1929q/62-63

Enclosure

cc: Division File
Maywood Region
USEPA, Region V, George Hamper
USEPA, Region V, Art Kawatachi
Reporting and Planning Section
Glenn Savage
Division of Legal Counsel
William T. Sinnott II

H all
TO: [redacted], RCRA Permits
I have no idea
why they are
corresponding to me.
I forwarded to 2/90 letter
to Ruth CD

Kane Co. 0890350005

Johnson Controls, Inc.
Battery Group
5757 N. Green Bay Avenue
Post Office Box 591
Milwaukee, WI 53201-0591
Tel. 414/228 1200

Maywood

JOHNSON CONTROLS

Ms. Cindy Davis
Illinois EPA
Division of Land Pollution
and Control #24
2200 Churchill Road
Springfield, IL 62706

March 28, 1991

Dear Ms. Davis:

RE: Part A Permit Status Change

On May 2, 1988, Johnson Controls, Inc. requested a status change for the Geneva facility. In follow-up correspondence (see attached), I confirmed our December 18, 1989, telephone conversation requesting the status change to that of generator only.

On December 28, 1990, a letter was sent to your attention notifying the agency a wholly-owned subsidiary had been created.

In an effort to update my files and insure all appropriate hazardous waste and stormwater regulations are being complied with, I would appreciate a document from your office approving our request the facility is a generator of hazardous waste only.

I am looking forward to your affirmative reply. If you have any questions or need further assistance, feel free to contact me.

Sincerely,

JOHNSON CONTROLS, INC.

Jordan S. Harwood, P.E.
Manager, Environmental Control

JSH/ajg

cc: K. L. Kirby
B. M. Fearnley

STATE OF ILLINOIS
RECEIVED
APR 01 1991
IEPA/DLPC

Johnson Controls, Inc.
Battery Group
5757 N. Green Bay Avenue
Post Office Box 591
Milwaukee, WI 53201-0591
Tel. 414/228 1200

O: WMD
cc: AF

JOHNSON CONTROLS

Mr. Valdas Adamkus
U.S. EPA Region V
Federal Building
230 S. Dearborn
Chicago, IL 60604

December 28, 1990

Dear Mr. Adamkus:

On November 19, 1990, Johnson Controls, Inc. formed a wholly-owned subsidiary into which the business of the Company's Battery Group is being transferred. The name of the new subsidiary, incorporated in Wisconsin, is Johnson Controls Battery Group, Inc.

In recognition of this transfer, we hereby request that the following permits and files be updated to reflect the new subsidiary as the permittee. In addition, please note the following personnel changes:

Corporate Contact: Jordan Harwood

Facility Contact: See below

Permit Numbers:

MID058816927 - Owosso, Michigan, facility - Mike Sunday
OHD000723510 - Holland, Ohio, facility - Pete Quinlan
ILD980502470 - Geneva, Illinois, facility - Brad Fearnley
WID000808840 - Keefe Avenue, Milwaukee, Wisconsin, facility - Eric Schneider
WID000808857 - Teutonia Avenue, Milwaukee, Wisconsin, facility - Doug Burnie

If you have any questions, please call me at (414) 228-2452. Thank you for your cooperation.

Sincerely,

JOHNSON CONTROLS, INC.

Jordan S. Harwood, P.E.
Manager, Environmental Control

cc: T. J. Oeschger R. G. Lytle K. L. Kirby
C. R. Giesige M. S. Baxa

5HW-12

MAR - 5 1984

Mr. Milton C. Zilis
Vice President and General Manager
Johnson Controls, Inc.
Globe Battery Division
5757 N. Green Bay Avenue
Milwaukee, Wisconsin 53201

Re: Revised Part A Permit Application
ILD 980502470

Dear Mr. Zilis:

This is to acknowledge receipt of your revised Part A permit application and your letter of February 8, 1984, regarding hazardous waste storage at your facility.

Please note that your revised Part A permit application was not dated. The application can not be considered complete unless every item in the form is answered. Accordingly, we are returning your application forms with a request that you date them. We will resume processing of your application when we receive the completed forms.

Please feel free to contact Mrs. Juana Rojo of my staff, at (312) 886-1477, if you have any questions on this matter.

Sincerely yours,

ORIGINAL SIGNED BY
HAK CHO FOR

William H. Miner, Chief
Technical, Permits, and Compliance Section

5HW:J.ROJO:ad 2/29/84 Disk #

INITIALS	TYPIST	AUTHOR	STU #1	STU #2	STU #3	for TPS Chief	AMB	WMD
	N.S. 3/1/84							
	A.D.	JER						
DATE	2-29-84	3-1-84	3/1/84	CHIEF	CHIEF	CHIEF	CHIEF	DIRECTOR
						HC 3/1/84		

Please print or type in the unshaded areas only
(fill—in areas are spaced for elite type, i.e., 12 characters/inch).

Form Approved OMB No. 158-R0175 329

FORM 1 GENERAL

EPA

ENVIRONMENTAL PROTECTION AGENCY

GENERAL INFORMATION

Consolidated Permits Program
(Read the "General Instructions" before starting.)

I. EPA I.D. NUMBER

F I L D 0 0 5 1 5 9 8 5 0 3

LABEL ITEMS

- EPA I.D. NUMBER
- III. FACILITY NAME
- V. FACILITY MAILING ADDRESS
- VI. FACILITY LOCATION

ILT180010316

PLEASE PLACE LABEL IN THIS SPACE

GENERAL INSTRUCTIONS

If a preprinted label has been provided, affix it in the designated space. Review the information carefully; if any of it is incorrect, cross through it and enter the correct data in the appropriate fill—in area below. Also, if any of the preprinted data is absent *(the area to the left of the label space lists the information that should appear)*, please provide it in the proper fill—in area*(s)* below. If the label is complete and correct, you need not complete Items I, III, V, and VI *(except VI-B which must be completed regardless)*. Complete all items if no label has been provided. Refer to the instructions for detailed item descriptions and for the legal authorizations under which this data is collected.

II. POLLUTANT CHARACTERISTICS

INSTRUCTIONS: Complete A through J to determine whether you need to submit any permit application forms to the EPA. If you answer "yes" to any questions, you must submit this form and the supplemental form listed in the parenthesis following the question. Mark "X" in the box in the third column if the supplemental form is attached. If you answer "no" to each question, you need not submit any of these forms. You may answer "no" if your activity is excluded from permit requirements; see Section C of the instructions. See also, Section D of the instructions for definitions of **bold—faced terms.**

SPECIFIC QUESTIONS	MARK 'X' YES	NO	FORM ATTACHED
A. Is this facility a **publicly owned treatment works** which results in a **discharge** to **waters of the U.S.**? (FORM 2A)		X	
B. Does or will this facility *(either existing or proposed)* include a **concentrated animal feeding operation** or **aquatic animal production facility** which results in a **discharge** to **waters of the U.S.**? (FORM 2B)		X	
C. Is this a facility which currently results in **discharges** to **waters of the U.S.** other than those described in A or B above? (FORM 2C)		X	
D. Is this a proposed facility *(other than those described in A or B above)* which will result in a **discharge** to **waters of the U.S.**? (FORM 2D)		X	
E. Does or will this facility treat, store, or dispose of **hazardous wastes**? (FORM 3)	X		X
F. Do you or will you inject at this facility industrial or municipal effluent below the lowermost stratum containing, within one quarter mile of the well bore, underground sources of drinking water? (FORM 4)		X	
G. Do you or will you inject at this facility any produced water or other fluids which are brought to the surface in connection with conventional oil or natural gas production, inject fluids used for enhanced recovery of oil or natural gas, or inject fluids for storage of liquid hydrocarbons? (FORM 4)		X	
H. Do you or will you inject at this facility fluids for special processes such as mining of sulfur by the Frasch process, solution mining of minerals, in situ combustion of fossil fuel, or recovery of geothermal energy? (FORM 4)		X	
I. Is this facility a proposed **stationary source** which is one of the 28 industrial categories listed in the instructions and which will potentially emit 100 tons per year of any air pollutant regulated under the Clean Air Act and may affect or be located in an **attainment area**? (FORM 5)		X	
J. Is this facility a proposed **stationary source** which is NOT one of the 28 industrial categories listed in the instructions and which will potentially emit 250 tons per year of any air pollutant regulated under the Clean Air Act and may affect or be located in an **attainment area**? (FORM 5)		X	

III. NAME OF FACILITY

1 SKIP JOHNSON CONTROLS INC GLOBE BATTERY DIV

IV. FACILITY CONTACT

A. NAME & TITLE *(last, first, & title)*	B. PHONE *(area code & no.)*		
2 FEARNLEY BRADLEY PROCESS ENGR	312	232	4270

V. FACILITY MAILING ADDRESS

A. STREET OR P.O. BOX

3 300 S GLENGARRY

B. CITY OR TOWN	C. STATE	D. ZIP CODE
4 GENEVA	IL	60134

VI. FACILITY LOCATION

A. STREET, ROUTE NO. OR OTHER SPECIFIC IDENTIFIER

5 300 S GLENGARRY

B. COUNTY NAME

KANE

C. CITY OR TOWN	D. STATE	E. ZIP CODE	F. COUNTY CODE *(if known)*
6 GENEVA	IL	60134	089

NOV 19, 1980 NOV 1 1980 NOV 1 5 1980

CONTINUE

CONTINUED FROM THE FRONT

VII. SIC CODES (4-digit, in order of priority)

A. FIRST	B. SECOND
3691 (specify) Lead Acid Battery Mfg.	(specify)
C. THIRD	**D. FOURTH**
(specify)	(specify)

VIII. OPERATOR INFORMATION

A. NAME: JOHNSON CONTROLS, INC.

B. Is the name listed in Item VIII-A also the owner? [X] YES [ ] NO

C. STATUS OF OPERATOR (Enter the appropriate letter into the answer box; if "Other", specify.)
F = FEDERAL, S = STATE, P = PRIVATE, M = PUBLIC (other than federal or state), O = OTHER (specify)
P (specify)

D. PHONE (area code & no.): 414 228 2452

E. STREET OR P.O. BOX: 5757 N GREEN BAY AVE

F. CITY OR TOWN: MILWAUKEE

G. STATE: WI

H. ZIP CODE: 53209

IX. INDIAN LAND

Is the facility located on Indian lands? [ ] YES [X] NO

X. EXISTING ENVIRONMENTAL PERMITS

A. NPDES (Discharges to Surface Water): 9 N — N/A	**D. PSD** (Air Emissions from Proposed Sources): 9 P
B. UIC (Underground Injection of Fluids): 9 U — N/A	**E. OTHER** (specify): 9 Z (specify) State of Ill. EPA I.D. No. is 089035AAF
C. RCRA (Hazardous Wastes): 9 R — N/A	**E. OTHER** (specify): 9 (specify)

XI. MAP

Attach to this application a topographic map of the area extending to at least one mile beyond property bounderies. The map must show the outline of the facility, the location of each of its existing and proposed intake and discharge structures, each of its hazardous waste treatment, storage, or disposal facilities, and each well where it injects fluids underground. Include all springs, rivers and other surface water bodies in the map area. See instructions for precise requirements.

XII. NATURE OF BUSINESS (provide a brief description)

Automotive Battery Manufacturing

XIII. CERTIFICATION (see instructions)

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this application and all attachments and that, based on my inquiry of those persons immediately responsible for obtaining the information contained in the application, I believe that the information is true, accurate and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

A. NAME & OFFICIAL TITLE (type or print)	B. SIGNATURE	C. DATE SIGNED
Milton C. Zilis, Vice-President Globe Battery Division	Milton Zilis	11/19/80

COMMENTS FOR OFFICIAL USE ONLY

Please print or type in the unshaded areas only
(fill—in areas are spaced for elite type, i.e., 12 characters/inch).

Form Approved OMB No. 158-S80004 329

FORM 3 RCRA

EPA

ENVIRONMENTAL PROTECTION AGENCY

HAZARDOUS WASTE PERMIT APPLICATION

Consolidated Permits Program

(This information is required under Section 3005 of RCRA.)

I. EPA I.D. NUMBER: S F I L T 1 8 0 0 1 9 3 1 6 3 T/A C 1

FOR OFFICIAL USE ONLY

APPLICATION APPROVED	DATE RECEIVED (yr., mo., & day)	COMMENTS

II. FIRST OR REVISED APPLICATION

Place an "X" in the appropriate box in A or B below *(mark one box only)* to indicate whether this is the first application you are submitting for your facility or a revised application. If this is your first application and you already know your facility's EPA I.D. Number, or if this is a revised application, enter your facility's EPA I.D. Number in Item I above.

A. FIRST APPLICATION *(place an "X" below and provide the appropriate date)*

[X] 1. EXISTING FACILITY *(See instructions for definition of "existing" facility. Complete item below.)*

FOR EXISTING FACILITIES, PROVIDE THE DATE (yr., mo., & day) OPERATION BEGAN OR THE DATE CONSTRUCTION COMMENCED *(use the boxes to the left)*

C	YR.	MO.	DAY
8	6 0	0 3	0 8

[ ] 2. NEW FACILITY *(Complete item below.)*

FOR NEW FACILITIES, PROVIDE THE DATE (yr., mo., & day) OPERATION BEGAN OR IS EXPECTED TO BEGIN

YR.	MO.	DAY

B. REVISED APPLICATION *(place an "X" below and complete Item I above)*

[ ] 1. FACILITY HAS INTERIM STATUS

[ ] 2. FACILITY HAS A RCRA PERMIT

III. PROCESSES – CODES AND DESIGN CAPACITIES

A. PROCESS CODE – Enter the code from the list of process codes below that best describes each process to be used at the facility. Ten lines are provided for entering codes. If more lines are needed, enter the code(s) in the space provided. If a process will be used that is not included in the list of codes below, then describe the process *(including its design capacity)* in the space provided on the form *(Item III-C)*.

B. PROCESS DESIGN CAPACITY – For each code entered in column A enter the capacity of the process.

1. AMOUNT – Enter the amount.
2. UNIT OF MEASURE – For each amount entered in column B(1), enter the code from the list of unit measure codes below that describes the unit of measure used. Only the units of measure that are listed below should be used.

PROCESS	PROCESS CODE	APPROPRIATE UNITS OF MEASURE FOR PROCESS DESIGN CAPACITY
Storage:		
CONTAINER *(barrel, drum, etc.)*	S01	GALLONS OR LITERS
TANK	S02	GALLONS OR LITERS
WASTE PILE	S03	CUBIC YARDS OR CUBIC METERS
SURFACE IMPOUNDMENT	S04	GALLONS OR LITERS
Disposal:		
INJECTION WELL	D79	GALLONS OR LITERS
LANDFILL	D80	ACRE-FEET *(the volume that would cover one acre to a depth of one foot)* OR HECTARE-METER
LAND APPLICATION	D81	ACRES OR HECTARES
OCEAN DISPOSAL	D82	GALLONS PER DAY OR LITERS PER DAY
SURFACE IMPOUNDMENT	D83	GALLONS OR LITERS

PROCESS	PROCESS CODE	APPROPRIATE UNITS OF MEASURE FOR PROCESS DESIGN CAPACITY
Treatment:		
TANK	T01	GALLONS PER DAY OR LITERS PER DAY
SURFACE IMPOUNDMENT	T02	GALLONS PER DAY OR LITERS PER DAY
INCINERATOR	T03	TONS PER HOUR OR METRIC TONS PER HOUR; GALLONS PER HOUR OR LITERS PER HOUR
OTHER *(Use for physical, chemical, thermal or biological treatment processes not occurring in tanks, surface impoundments or incinerators. Describe the processes in the space provided; Item III-C.)*	T04	GALLONS PER DAY OR LITERS PER DAY

UNIT OF MEASURE	UNIT OF MEASURE CODE
GALLONS	G
LITERS	L
CUBIC YARDS	Y
CUBIC METERS	C
GALLONS PER DAY	U
LITERS PER DAY	V
TONS PER HOUR	D
METRIC TONS PER HOUR	W
GALLONS PER HOUR	E
LITERS PER HOUR	H
ACRE-FEET	A
HECTARE-METER	F
ACRES	B
HECTARES	Q

EXAMPLE FOR COMPLETING ITEM III *(shown in line numbers X-1 and X-2 below)*: A facility has two storage tanks, one tank can hold 200 gallons and the other can hold 400 gallons. The facility also has an incinerator that can burn up to 20 gallons per hour.

S C DUP T/A C 1

LINE NUMBER	A. PROCESS CODE (from list above)	B. PROCESS DESIGN CAPACITY 1. AMOUNT (specify)	B. PROCESS DESIGN CAPACITY 2. UNIT OF MEASURE (enter code)	FOR OFFICIAL USE ONLY
X-1	S 0 2	600	G	
X-2	T 0 3	20	E	
1	S 0 1	10,000	G	
2	T 0 1	225,000	U	
3	S 0 2	5,000	G	
4				
5				
6				
7				
8				
9				
10				

Continued from the front.

III. PROCESSES *(continued)*

C. SPACE FOR ADDITIONAL PROCESS CODES OR FOR DESCRIBING OTHER PROCESSES *(code "T04")*. **FOR EACH PROCESS ENTERED HERE INCLUDE DESIGN CAPACITY.**

IV. DESCRIPTION OF HAZARDOUS WASTES

A. EPA HAZARDOUS WASTE NUMBER – Enter the four–digit number from 40 CFR, Subpart D for each listed hazardous waste you will handle. If you handle hazardous wastes which are not listed in 40 CFR, Subpart D, enter the four–digit number*(s)* from 40 CFR, Subpart C that describes the characteristics and/or the toxic contaminants of those hazardous wastes.

B. ESTIMATED ANNUAL QUANTITY – For each **listed waste** entered in column A estimate the quantity of that waste that will be handled on an annual basis. For each **characteristic** or **toxic contaminant** entered in column A estimate the total annual quantity of all the non–listed waste*(s)* that will be handled which possess that characteristic or contaminant.

C. UNIT OF MEASURE – For each quantity entered in column B enter the unit of measure code. Units of measure which must be used and the appropriate codes are:

ENGLISH UNIT OF MEASURE	CODE	METRIC UNIT OF MEASURE	CODE
POUNDS	P	KILOGRAMS	K
TONS	T	METRIC TONS	M

If facility records use any other unit of measure for quantity, the units of measure must be converted into one of the required units of measure taking into account the appropriate density or specific gravity of the waste.

D. PROCESSES

1. PROCESS CODES:
   For listed hazardous waste: For each **listed** hazardous waste entered in column A select the code*(s)* from the list of process codes contained in Item III to indicate how the waste will be stored, treated, and/or disposed of at the facility.
   For non–listed hazardous wastes: For each characteristic or toxic contaminant entered in column A, select the code*(s)* from the list of process codes contained in Item III to indicate **all** the processes that will be used to store, treat, and/or dispose of all the non–listed hazardous wastes that possess that characteristic or toxic contaminant.
   Note: Four spaces are provided for entering process codes. If more are needed: (1) Enter the first three as described above; (2) Enter "000" in the extreme right box of Item IV-D(1); and (3) Enter in the space provided on page 4, the line number and the additional code*(s)*.

2. PROCESS DESCRIPTION: If a code is not listed for a process that will be used, describe the process in the space provided on the form.

NOTE: HAZARDOUS WASTES DESCRIBED BY MORE THAN ONE EPA HAZARDOUS WASTE NUMBER – Hazardous wastes that can be described by more than one EPA Hazardous Waste Number shall be described on the form as follows:

1. Select one of the EPA Hazardous Waste Numbers and enter it in column A. On the same line complete columns B,C, and D by estimating the total annual quantity of the waste and describing all the processes to be used to treat, store, and/or dispose of the waste.
2. In column A of the next line enter the other EPA Hazardous Waste Number that can be used to describe the waste. In column D(2) on that line enter "included with above" and make no other entries on that line.
3. Repeat step 2 for each other EPA Hazardous Waste Number that can be used to describe the hazardous waste.

EXAMPLE FOR COMPLETING ITEM IV *(shown in line numbers X-1, X-2, X-3, and X-4 below)* – A facility will treat and dispose of an estimated 900 pounds per year of chrome shavings from leather tanning and finishing operation. In addition, the facility will treat and dispose of three non–listed wastes. Two wastes are corrosive only and there will be an estimated 200 pounds per year of each waste. The other waste is corrosive and ignitable and there will be an estimated 100 pounds per year of that waste. Treatment will be in an incinerator and disposal will be in a landfill.

LINE NO.	A. EPA HAZARD. WASTE NO (enter code)	B. ESTIMATED ANNUAL QUANTITY OF WASTE	C. UNIT OF MEASURE (enter code)	D. PROCESSES 1. PROCESS CODES (enter)	D. PROCESSES 2. PROCESS DESCRIPTION (if a code is not entered in D(1))
X-1	K 0 5 4	900	P	T 0 3 D 8 0	
X-2	D 0 0 2	400	P	T 0 3 D 8 0	
X-3	D 0 0 1	100	P	T 0 3 D 8 0	
X-4	D 0 0 2				*included with above*

Continued from page 2.
NOTE: Photocopy this page before completing if you have more than 26 wastes to list.

Form Approved OMB No. 158-S80004

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EPA I.D. NUMBER (enter from page 1): W ~~I L D 0 0 5 1 5 9 8 5 0~~ ILT180010779 T/A C 3 1

FOR OFFICIAL USE ONLY: W DUP — T/A C: 2 — DUP

IV. DESCRIPTION OF HAZARDOUS WASTES (continued)

LINE NO.	A. EPA HAZARD. WASTE NO. (enter code)	B. ESTIMATED ANNUAL QUANTITY OF WASTE	C. UNIT OF MEASURE (enter code)	D. PROCESSES 1. PROCESS CODES (enter)	D. PROCESSES 2. PROCESS DESCRIPTION (if a code is not entered in D(1))
1 (001)	D008	330,000	T	T01	
2 (001)	D002				included with above
3	D008	1200	T	T01 S03	
4	D008	150	T	S02	
5					
6					
7					
8					
9					
10					
11					
12					
13					
14					
15					
16					
17					
18					
19					
20					
21					
22					
23					
24					
25					
26					

EPA Form 3510-3 (6-80)

CONTINUE ON REVERSE

(enter "A", "B", "C", etc. behind the "3" to identify photocopied pages)

Continued from the front.

IV. DESCRIPTION OF HAZARDOUS WASTES (continued)

E. USE THIS SPACE TO LIST ADDITIONAL PROCESS CODES FROM ITEM D(1) ON PAGE 3.

EPA I.D. NO. (enter from page 1)

S		T/A	C
F	~~I L D 0 0 5 1 5 9 8 5 0~~ ILT180010779	3	6

V. FACILITY DRAWING

All **existing** facilities must include in the space provided on page 5 a scale drawing of the facility *(see instructions for more detail).*

VI. PHOTOGRAPHS

All existing facilities must include photographs *(aerial or ground—level)* that clearly delineate all existing structures; existing storage, treatment and disposal areas; and sites of future storage, treatment or disposal areas *(see instructions for more detail).*

VII. FACILITY GEOGRAPHIC LOCATION

LATITUDE (degrees, minutes, & seconds)	LONGITUDE (degrees, minutes, & seconds)
41 53 040	088 17 040

VIII. FACILITY OWNER

XX A. If the facility owner is also the facility operator as listed in Section VIII on Form 1, "General Information", place an "X" in the box to the left and skip to Section IX below.

B. If the facility owner is not the facility operator as listed in Section VIII on Form 1, complete the following items:

	1. NAME OF FACILITY'S LEGAL OWNER	2. PHONE NO. (area code & no.)
E	Johnson Controls Inc., Globe Battery Division	414-228-2452

	3. STREET OR P.O. BOX		4. CITY OR TOWN	5. ST.	6. ZIP CODE
F	P.O. Box 591	G	Milwaukee	WI	53201

IX. OWNER CERTIFICATION

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this and all attached documents, and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

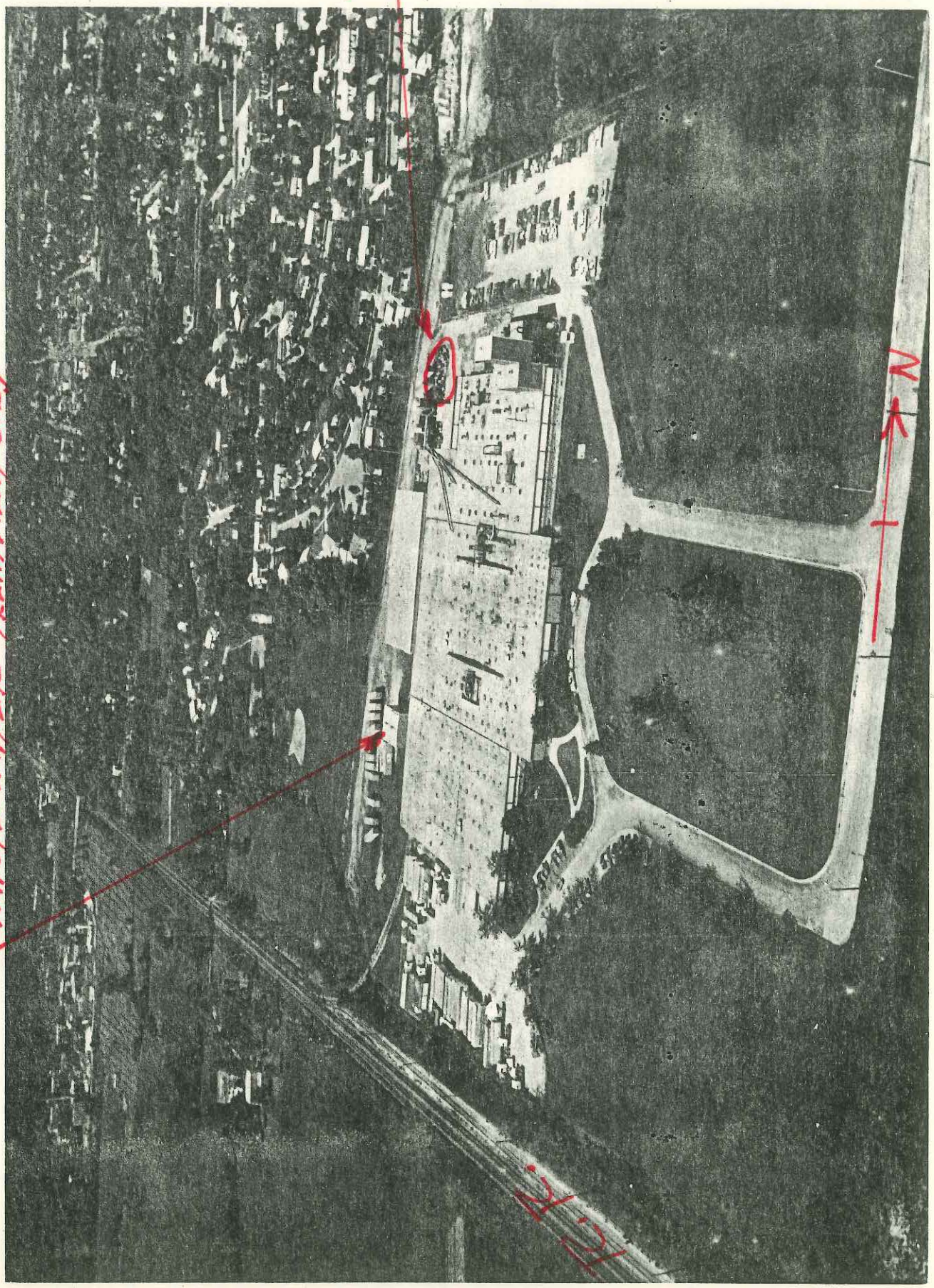
A. NAME (print or type)	B. SIGNATURE	C. DATE SIGNED
Milton C. Zilis, Vice President	Milton Zilis	11/19/80

X. OPERATOR CERTIFICATION

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this and all attached documents, and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

A. NAME (print or type)	B. SIGNATURE	C. DATE SIGNED

CONTINUE ON PAGE 5



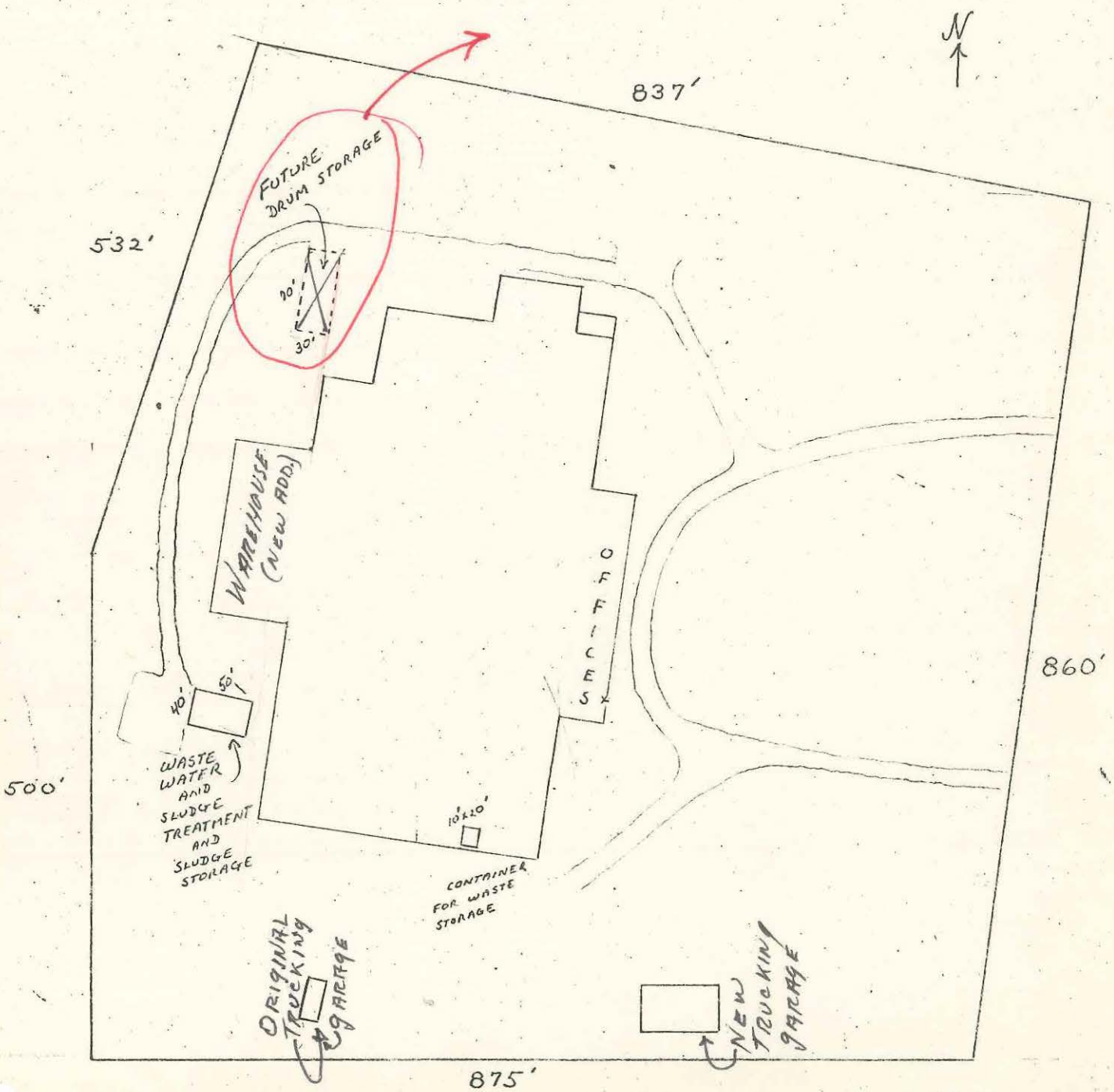
GENEVA, ILLINOIS

JOHNSON CONTROLS

Form Approved OMB No. 158-S80004

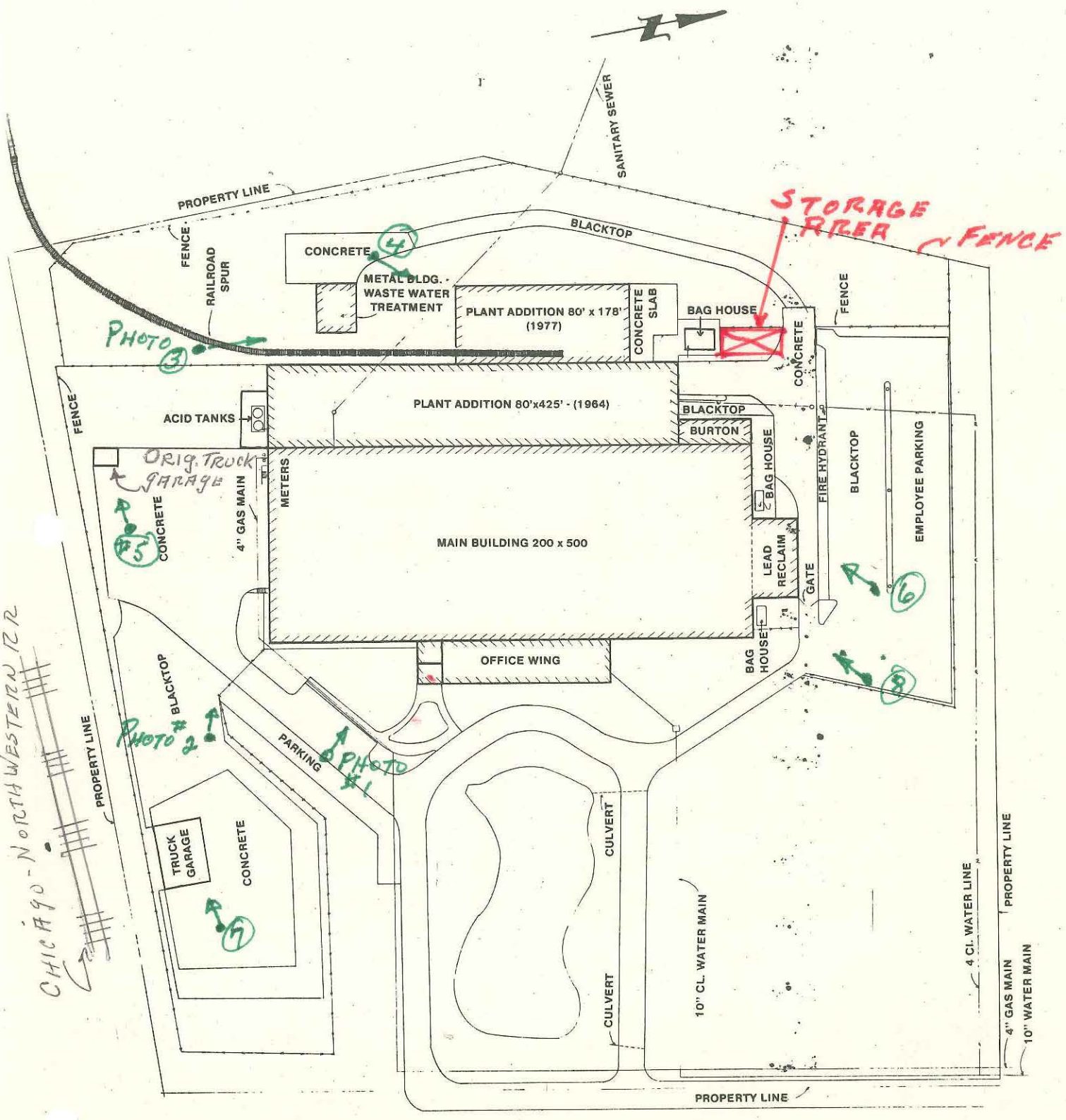
329

V. FACILITY DRAWING (see page 4)

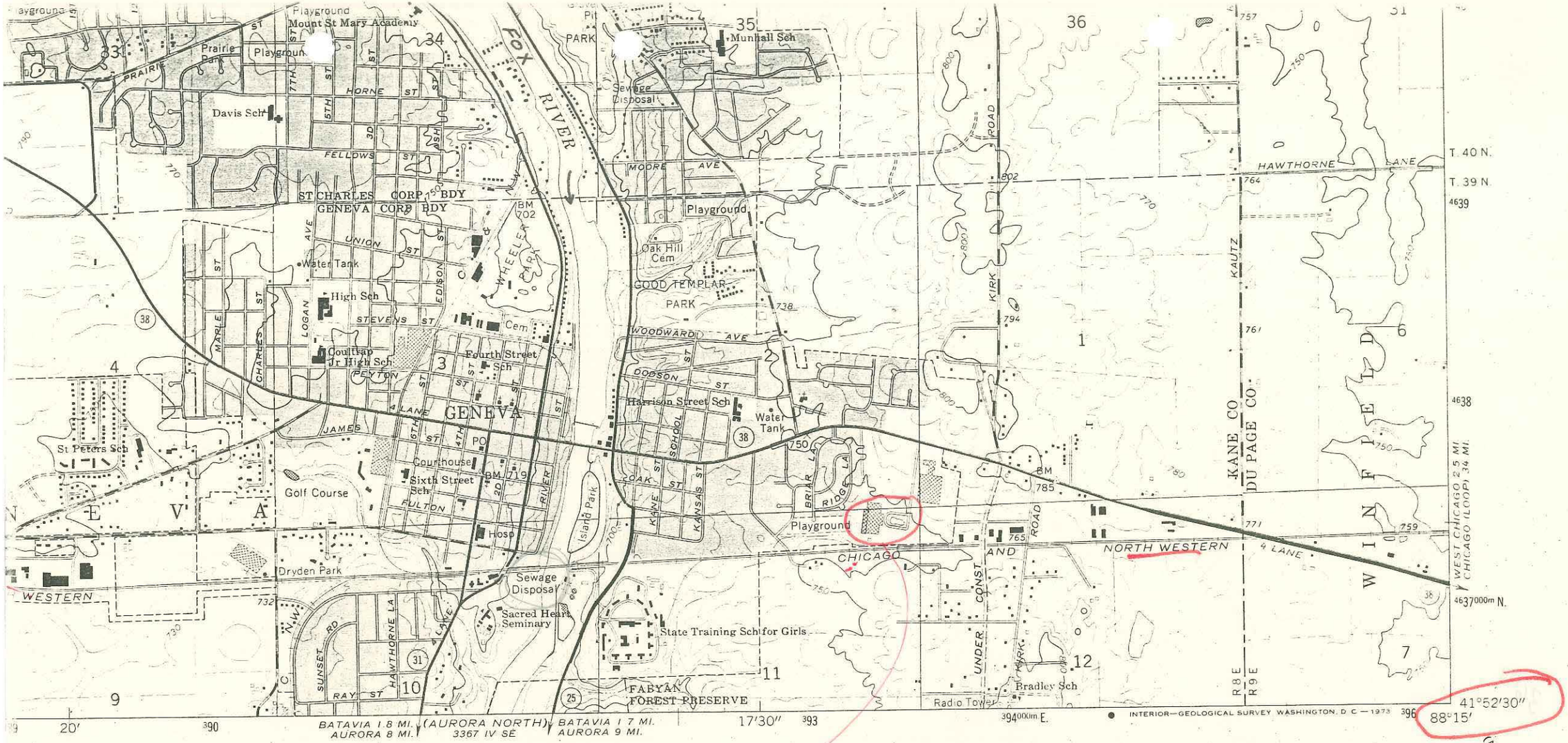


JOHNSON CONTROLS
GLOBE BATTERY DIV.
300 SO. GLENGARRY
GENEVA ILL. 60134

SCALE: 1" = 150'


PROPERTY LINE
FENCE
RAILROAD SPUR
SANITARY SEWER
BLACKTOP
CONCRETE
METAL BLDG. - WASTE WATER TREATMENT
PLANT ADDITION 80' x 178' (1977)
CONCRETE SLAB
BAG HOUSE
STORAGE AREA
FENCE
PHOTO 3
ACID TANKS
PLANT ADDITION 80'x425' - (1964)
BLACKTOP
BURTON
CONCRETE
FIRE HYDRANT
BLACKTOP
EMPLOYEE PARKING
ORIG. TRUCK GARAGE
METERS
4" GAS MAIN
CONCRETE
BAG HOUSE
MAIN BUILDING 200 x 500
LEAD RECLAIM
GATE
OFFICE WING
BAG HOUSE
BLACKTOP
PHOTO #2
PARKING
PHOTO #1
PROPERTY LINE
TRUCK GARAGE
CONCRETE
CULVERT
CULVERT
10" CL. WATER MAIN
4 CI. WATER LINE
PROPERTY LINE
4" GAS MAIN
10" WATER MAIN
PROPERTY LINE
CHICAGO - NORTH WESTERN R R

GENEVA



SCALE 1:24 000

1 MILE

7000 FEET

1 KILOMETER

CONTOUR INTERVAL 10 FEET
DOTTED LINES REPRESENT 5-FOOT CONTOURS
DATUM IS MEAN SEA LEVEL

ROAD CLASSIFICATION

Heavy-duty — Light-duty

Medium-duty — Unimproved dirt

U.S. Route — State Route

ILLINOIS

QUADRANGLE LOCATION

ETIC NORTH
OF SHEET

THIS MAP COMPLIES WITH NATIONAL MAP ACCURACY STANDARDS
FOR SALE BY U. S. GEOLOGICAL SURVEY, WASHINGTON, D. C. 20242
AND BY THE STATE GEOLOGICAL SURVEY, URBANA, ILLINOIS 61801
A FOLDER DESCRIBING TOPOGRAPHIC MAPS AND SYMBOLS IS AVAILABLE ON REQUEST

INTERIOR—GEOLOGICAL SURVEY WASHINGTON, D C—1973

GENEVA, ILL.

NE/4 GENEVA 15' QUADRANGLE
N4152.5—W8815/7.5

1964
PHOTOREVISED 1972
AMS 3367 IV NE—SERIES V863

JOHNSON CONTROLS
GLOBE DIV.
300 So. GLENGARRY
GENEVA

329

Johnson Controls, Inc.
5757 North Green Bay Avenue
Post Office Box 591
Milwaukee, Wisconsin 53201
Tel. 414/228 1200

329

GENEVA PLANT
GENEVA ILL.
11/15/80

Globe Battery Division

(7) NEW TRUCK SERVICING BLDG LOOKING WEST SOUTH END OF PROPERTY

LEAD OXIDE STORAGE TOWER FOR PBO PASTE MIXING PHOTO (8) LOOKING SOUTH WEST

ORIG. PHOTO (5) TRUCK SERVICING BLDG LOOKING WEST

ELEVATION OF NORTH SIDE OF PLANT PHOTO (2) LOOKING SOUTH WEST.

Johnson Controls, Inc.
5757 N[illegible]h Green Bay Avenue
Post O[illegible]e Box 591
Milwaukee, Wisconsin 53201
Tel. 414/228 1200

329

GENEVA PLANT
GENEVA ILL.
11/15/80

Globe Battery Division

PHOTO (1) FRONT ELEVATION - OFFICE AREA LOOKING NORTH WEST

(2) SOUTH END OF MAIN BLDG SHIPPING AREA LOOKING WEST

SOUTH ELEVATION OF WAREHOUSE LOOKING N.E. PHOTO (4)

(3) ELEVATION OF SOUTH SIDE OF WASTE WATER TREATMENT BLDG LOOKING NORTH ALONG R.R.

Johnson Controls, Inc.
5757 North Green Bay Avenue
Post Office Box 591
Milwaukee, Wisconsin 53201
Tel. 414/228 1200

Globe Battery Division

Mr. Rich Karl
EPA Region 5
RCRA Activities
P. O. Box 7861
Chicago, IL 60680

March 27, 1981

RE: EPA ID # ILD005159850
Geneva ~~Plant~~

Gentlemen: ILT1800 10316

Please be advised that on September 30, 1980, Globe-Union, Inc., was dissolved and its assets and liabilities have been assigned and transferred in their entirety to Johnson Controls, Inc. We are now known legally as the Globe Battery Division, Johnson Controls, Inc.

Very Truly Yours,

Robert F. Nicolai
Manager, Environmental Control

Johnson Controls,
Globe Battery Div.
Corrected
5-5-81

cc: K. L. Kirby
J. M. Beaudoin
B. Fearnley

RFN/jak

SUB./NOTIFICATION

APR 06 1981

A.4 Closure/Post-Closure

State of Illinois
ENVIRONMENTAL PROTECTION AGENCY

Maywood

Mary A. Gade, Director

2200 Churchill Road, Springfield, IL 62794-9276

217/524-3300

September 5, 1997

CERTIFIED MAIL
P 344 343 646

Johnson Controls
Attn: Michael Meves
300 Glengarry Drive
Geneva, Illinois 60134

Re: 0890350005 – Kane County
Johnson Controls -- Globe Battery Division
ILD980052470
Log No. C-720
Received: May 12, 1997
RCRA Closure

Dear Mr. Meves:

This is in response to the certification of closure submitted on your behalf by Wayne P. Fassbender, by Graef Anhalt & Schloemer, Inc., for the hazardous waste tank (SO2) at the above-referenced facility. This certification, signed by a representative of the owner/operator, Vincent Sheily, and an independent registered professional engineer, Douglas F. Hambley, Ph.D., P.E., indicated that the subject hazardous waste management unit has been closed in accordance with the plan approved by the Illinois EPA (Log No. C-720 and associated modifications).

The subject hazardous waste management unit was inspected by a representative of Illinois EPA on July 25, 1997. The inspection revealed that the unit was closed in accordance with the approved closure plan. In addition, a review of the closure certification and accompanying closure documentation report also indicates that the unit was closed in accordance with the approved closure plan. Therefore, Illinois EPA has determined that closure of the hazardous waste tank (S02) area at the above referenced facility has apparently met the requirements of 35 IAC 725.

As a result of completing closure of the subject hazardous waste management unit:

a. This facility must continue to meet the requirements of 35 IAC 722 Standards Applicable to Generators of Hazardous Waste and 35 IAC 728 Land Disposal Restrictions.

b. The location of the soil boring should be permanently sealed to prevent migration to the underlying soil.

Should you have any questions regarding this matter, please contact William T. Sinnott, II at 217/524-3310.

Sincerely,

Edwin C. Bakowski, P.E.
Manager, Permit Section
Bureau of Land

ECB:WTS\mls\973523.WPD
JVM

cc: Doug Hambley

bcc: Bureau File
Maywood Region
Jim Moore
Bill Sinnott

State of Illinois
ENVIRONMENTAL PROTECTION AGENCY

Mary A. Gade, Director

1701 First Avenue, Maywood, IL 60153

MEMORANDUM

DATE: July 25, 1997

TO: Division File

FROM: Tina Kovasznay, BOL/FOS, Maywood

SUBJECT: 0890350005 - Kane County
Johnson Controls Battery Group
ILD980502470
RCRA Closure
Log No. C-720

The subject site had a 5,000 gallon sludge storage tank which contained D008 and D002 wastes for greater than 90 days. The tank was located on a concrete pad located in the northwest corner of the wastewater treatment plant. This tank was decommissioned in 1989. Activities included sludge removal, high pressure washing, tank cut up and disposal at a recycler. The concrete pad below this storage tank was the subject of this closure inspection. According to the closure plan, the pad was to be steam cleaned and triple rinsed. The scraped residuals were to be placed in a dewatered sludge drum and the wastewater was to be routed to a sump which leads to the wastewater treatment system. Following a September 29, 1994 inspection, I noted the following deficiencies:

1) Condition 3: Although a crack was found in the pad, no samples were taken.
2) Condition 1a: There are no records of the volume of waste or waste residue removed. Waste was not collected or sampled. Liquid waste was put through the wastewater treatment system. Residue scraped from the pad was apparently placed into a drum and sent to a smelter under a bill of lading. No records of the shipment are available.
3) Condition 23: An LPC-PA18 form was not submitted with the closure documentation report.
4) A considerable amount of staining was observed on the pad.

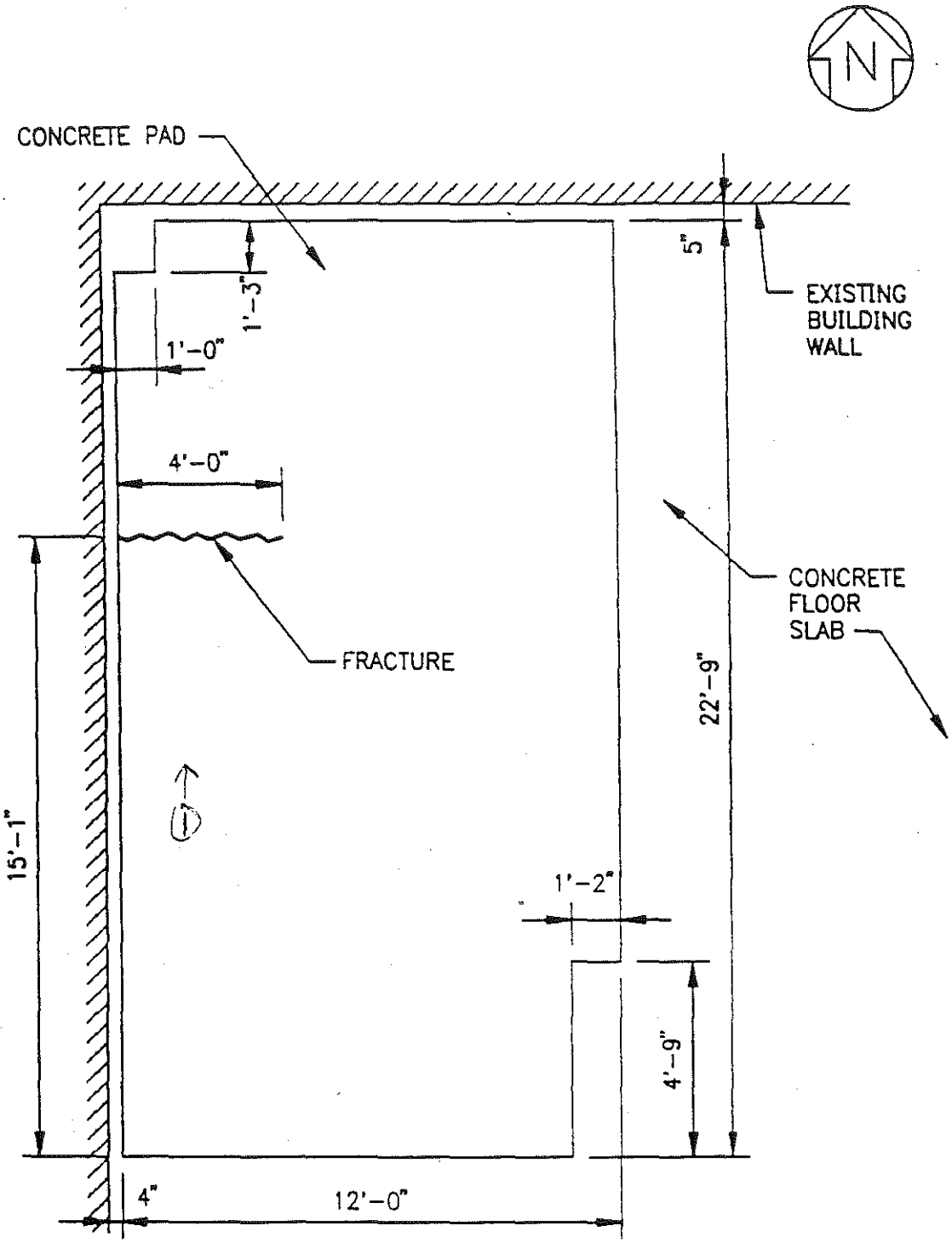
On May 9, 1997, a supplementary closure report was submitted to the Agency. The latest submittal indicated the crack in the concrete pad was cored down to backfill showing that the crack extended to backfill. As such, the facility collected a soil sample from 30 inches below the concrete, the soil/gravel interface, and analyzed the soil for RCRA metals and pH. The results of the analysis indicates the levels are below the Tier 1 TACO values.

On July 25, 1997, a follow up inspection was conducted to observe the concrete pad. At the time of the inspection, a considerable amount of staining was again observed. The following deficiencies were observed:

1) According to the closure plan, the temporary expandable plug was to be removed from the hole that was cored into the concrete slab. The hole and the existing crack were to be plugged using an appropriate cement-based sealant to prevent any future migration of liquids into the underlying soil. **This has not yet been done.**
2) Condition 1a: **There are no records of the volume of waste or waste residue removed.** Waste was not collected or sampled. The liquid portion was put through the wastewater treatment system, and **the residue scraped from the pad was apparently placed into a drum and sent to a smelter under a bill of lading. No records were available for this shipment.**
3) **Considerable staining was observed.** According to Mr. Brad Fearnley, this staining is due to the oxidation of ferrous sulfate.

Although it appears as if there is no contamination under the pad, the facility did not close the unit in accordance with all of th conditions of the closure plan approval letter and the supplemental closure report.

cc: Maywood Region
BOL Permits - Bill Sinnott



PLAN

2

0890350005 - Kane County

Baxter & Woodman
consulting engineers
Crystal Lake Schererville Burlington

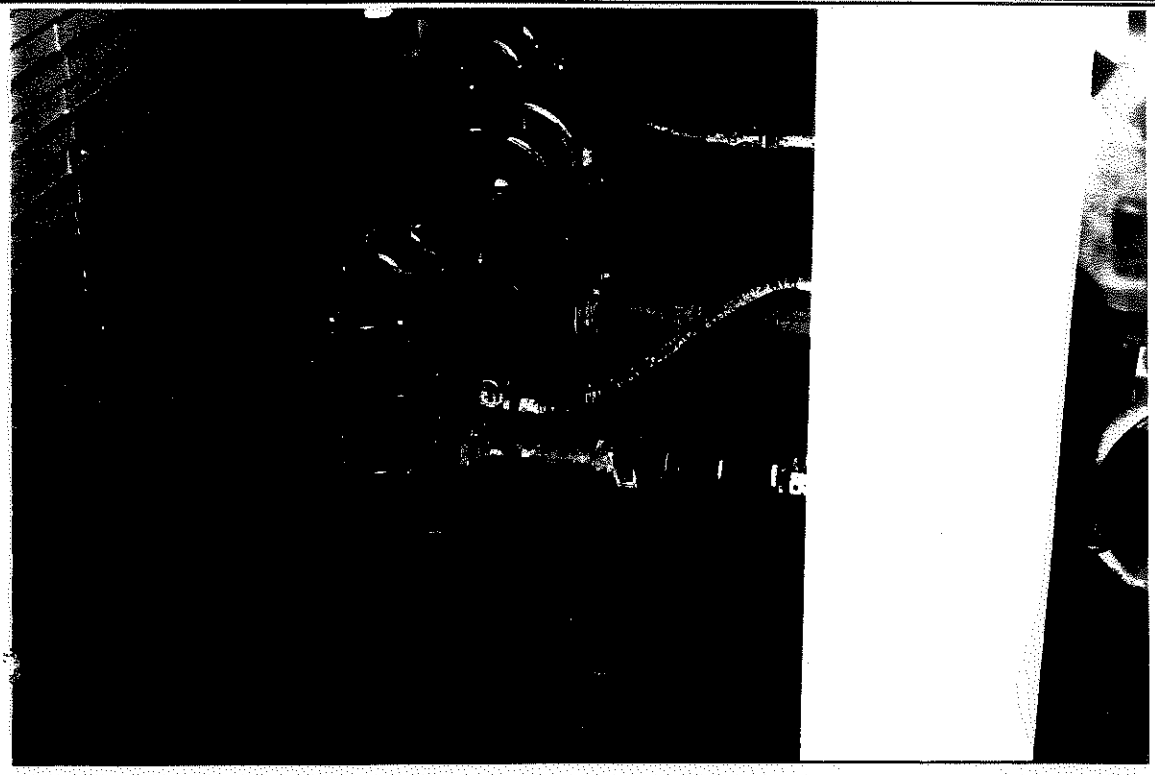
JOHNSON CONTROLS
BATTERY DIVISION
GENEVA FACILITY
PHOTO REFERENCE
HAZARDOUS WASTE STORAGE AREA CLOSURE

DESIGNED BY SGZ	SCALE 1/4" = 1'-0"
DRAWN BY DRB	PROJECT NO. 930293
CHECKED BY SGZ	SHEET NO.
DATE 8-8-94	1 OF 1

Illinois Environmental Protection Agency Photographs

Site Name: Johnson Controls IEPA #: 0890350005

Date: 7-25-97 Time: 1:45 - 2:10 pm Photograph By: Tina Kovasznay



Comments: N: Close up of crack in concrete - rubber plug in bore hole.

Roll #: 98-026 Photo #: 1

Comments: N: Overall view of concrete pad.

Roll #: 98-026 Photo #: 2

State of Illinois
ENVIRONMENTAL PROTECTION AGENCY

Mary A. Gade, Director

2200 Churchill Road, Springfield, IL 62794-9276

MEMORANDUM

DATE: 6/18/97

TO: Maywood FOS

FROM: William T. Sinnott, II
JKM

SUBJECT: Re: 0890350005 -- Kane County
Johnson Controls
ILD980052470
RCRA Closure
Log No. C-720

RECEIVED
ENVIRONMENTAL PROTECTION AGENCY

JUN 20 1997

BUREAU OF LAND POLLUTION CONTROL
STATE OF ILLINOIS

INTRODUCTION
On May 12, 1997 the Agency received a "RCRA Supplementary Closure Report" for the above-referenced facility. The facility is located in Geneva, Illinois, Kane County. The facility manufactures lead-acid batteries.

DISCUSSION OF UNITS BEING CLOSED
Prior to 1989, a hazardous waste management unit, consisting of a 5,000-gallon sludge tank, was located in the wastewater treatment building. The tank was located on a concrete base, inside a building. This tank was decommissioned in 1989. Activities included sludge removal, high pressure washing, and tank cut-up and recycling.

COMPLETED CLOSURE ACTIVITIES
The concrete pad was scraped and the residue resulted in approximately 2 gallons. The concrete pad was steam cleaned and triple rinsed and the liquids were routed to the wastewater treatment plant.

In a September 29, 1994 memo, Ms. Tina Kovasznay indicated the previous closure documentation report was unacceptable because the facility did not collect any soil samples beneath the crack in the concrete and the disposition of the cleaning residues was not discussed. The facility submitted a closure documentation report on May 9, 1997.

The latest submittal indicated the crack in the concrete pad was cored down to backfill. Thus, a cross section of the core indicated the crack extended to backfill. As such, the facility collected a soil sample from 30" below the concrete, which was the soil/gravel interface, and analyzed the soil for RCRA metals and pH. The results of the analysis indicates the levels are below the Tier 1 TACO values.

RECOMMENDATION

The closure documentation report for the hazardous waste S02 tanks should be accepted provided that a visual inspection of the unit is satisfactory.

WTS\mls\971976.WPD

P1135 221 7/7

File

State of Illinois
ENVIRONMENTAL PROTECTION AGENCY

Mary A. Gade, Director
217/524-3300

2200 Churchill Road, Springfield, IL 62794-9276

January 25, 1994

Johnson Controls
Attn: Michael Meves
300 Glengarry Drive
Geneva, Illinois 60134

Re: 0890350005 -- Kane County
Johnson Controls - Globe Battery Division
ILD980052470
Log No. C-720
Received: November 18, 1993
RCRA Closure

Dear Mr. Meves:

The closure plan submitted on behalf of Johnson Controls by Baxter and Woodman has been reviewed by this Agency. Your final closure plan to close the hazardous waste tank (SO2) storage area at the above referenced facility (referred to as the 5,000 gallon sludge storage tank whose location is shown in Appendices B and D of the closure plan) is hereby approved subject to the following conditions and modifications:

1. Closure activities must be completed by August 1, 1994. When closure is complete the owner or operator must submit to the Agency certification both by the owner or operator and by an independent registered professional engineer that the facility has been closed in accordance with the specifications in the approved closure plan. This certification must be received at this Agency within sixty (60) days after closure, or by October 1, 1994. These dates may be extended if Johnson Controls finds that additional time is necessary to complete all required closure activities and Johnson Controls demonstrates to the agency that it is attempting to complete closure in a timely manner.

   The attached closure certification form must be used. Signatures must meet the requirements of 35 Ill. Adm. Code Section 702.126. The independent engineer should be present at all critical, major points (activities) during the closure. These might include soil sampling, soil removal, backfilling, final cover placement, etc. The frequency of inspections by the independent engineer must be sufficient to determine the adequacy of each critical activity. Financial assurance must be maintained for the units approved for closure herein until the Agency approves the facility's closure certification.

The Illinois Professional Engineering Act (Ill. Rev. Stat., Ch. 111, par. 5101 et. seq.) requires that any person who practices professional engineering in the State of Illinois or implies that he (she) is a professional engineer must be registered under the Illinois Professional Engineering Act (par. 5101, Sec. 1). Therefore, any certification or engineering services which are performed for a closure plan in the State of Illinois must be done by an Illinois P.E.

Plans and specifications, designs, drawings, reports, and other documents rendered as professional engineering services, and revisions of the above must be sealed and signed by a professional engineer in accordance with par. 5119, sec. 13.1 of the Illinois Professional Engineering Act.

As part of the closure certification, to document the closure activities at your facility, a Closure Documentation Report which must be submitted which includes the following:

a. The volume of waste, waste residue and contaminated soil (if any) removed. The term waste includes wastes resulting from decontamination activities.

b. Scaled drawings showing the horizontal and vertical boundaries of the extent of any soil removal effort.

c. A description of the method of waste handling and transport.

d. The waste manifest numbers.

e. Copies of the waste manifests.

f. Information documenting the results of all sampling/analysis efforts. The goal of presenting this information should be to describe, in a logical manner, the activities and results associated with the sampling/analysis effort. At a minimum, this information must include:

    1. identification of the reason for the sampling/analysis effort and the goals of the effort;

    2. a summary in tabular form of all analytical data, including all quality assurance/quality control data;

    3. a scaled drawing showing the horizontal location from which all soil samples were collected;

    4. identification of the depth and vertical interval from which each sample was collected;

    5. a description of the soil sampling procedures, sample preservation procedures and chain of custody procedures;

6. identification of the test method used and detection limits achieved, including sample preparation, sample dilution (if necessary) and analytical inferences;

7. copies of the final laboratory report sheets, including final sheets reporting all quality assurance/quality assurance dates;

8. visual classification of each soil sample in accordance with ASTM D-2488;

9. a summary of all procedures used for quality assurance/quality control, including the results of these procedures; and

10. a discussion of the data, as it relates to the overall goal of the sampling/analysis effort.

2. The concrete surfaces within the tank storage area shall be visually inspected, photographed and any residue adhering to the surface must be removed by scraping and/or brushing. Following this, the concrete surfaces must be steam cleaned and triple rinsed. All wash and rinse water shall be collected. If the wash or rinse water samples exhibit a characteristic of hazardous waste then that material must be managed as a hazardous waste. In any event the material must be managed as a special waste.

   After cleaning the concrete surfaces, an independent registered professional engineer shall inspect the integrity of the concrete surfaces. These surfaces shall be inspected for cracks which penetrate through the concrete. In addition, all construction joints must be inspected to ensure they are watertight. This inspection must be carried out in accordance with standards and recommendations of professional/technical entities such as the American Concrete Institute, the Portland Cement Association the American Society for Testing and Materials, the American Society of Civil Engineers, etc. which relate to the ability of concrete structures to contain liquids. The results of this inspection shall be (1) submitted in the form of a report, (2) included in the closure documentation report required by condition, and (3) certified in accordance with 35 Ill. Adm. Code 702.126 by the engineer. The reports must include (1) the results of the inspection, (2) scaled drawings showing the location of all cracks and construction joints observed during the investigation, (3) conclusions reached regarding any cracks or construction joints observed in the areas of concern, (4) justification for the conclusions reached (e.g., information must be provided which indicates that any construction joints in the areas of concern are indeed watertight), and (5) photographs to support the conclusions reached.

3. If joints, cracks or other defects are found in the concrete during the inspection required by Condition 2 above which would potentially allow hazardous waste or hazardous constituents to migrate through them, then soil samples must be collected from beneath them to determine if hazardous waste or hazardous constituents have been released to the underlying soil. This sampling/analysis effort shall be carried out in accordance to the below listed procedures.

   a. Samples must be collected from at least one location along each joint or crack that provides a potential for hazardous waste or hazardous constituents to migrate to underlying soil. Such locations shall be biased to stained areas or low-lying areas where spills would tend to accumulate.

   b. The procedures used to collect and analyze all samples shall be carried out in accordance with the procedures approved by this letter.

   c. Samples shall be collected from 0"-6" and from 18"-24" below the subgrade/natural soil interface.

4. The following procedure must be utilized in the collection of all required soil samples:

   a. The procedures used to collect the soil samples must be sufficient so that all soil encountered is classified in accordance with ASTM Method D-2488.

   b. If a drill rig or similar piece of equipment is necessary to collect required soil samples, then:

      1. the procedures specified in ASTM Method D-1586 (Split Spoon Sampling) or D-1587 (Shelby Tube Sampling) must be used in collecting the samples.

      2. Soil samples must be collected continuously at several locations to provide information regarding the shallow geology of the area where the investigation is being conducted;

5. Quality assurance/quality control procedures which meet the requirements of SW-846 must be implemented during all required sampling/analysis efforts. In addition, all analytical procedures must be carried out in accordance with SW-846.

6. All necessary soil samples shall be analyzed individually (i.e., no compositing). Analytical procedures shall be conducted in accordance with Test Methods for Evaluating Solid Wastes, Third Edition (SW-846). When a SW-846 (Third Edition) analytical method is specified, all the chemicals listed in the Quantitation Limits Table for that method shall be reported unless specifically exempted in writing by the Agency. Apparent visually contaminated material within a sampling interval shall be included in the sample portion of the interval to be analyzed.

Each soil sample collected must be analyzed for the constituents listed in Conditon 7 below. The detection limits achieved during the analysis must be below the associated clean-up objectives also listed in Conditon 7.

7. If soil sampling/analysis is necessary, then to ensure the clean-closure requirements of 35 IAC 725.211 and 725.214 are met the soil which remains in and around the tank unit must meet the following cleanup objectives (CUOs):

Parameter	Cleanup Objective (mg/l)
Copper (TCLP)	0.65
Lead (TCLP)	0.0075

NOTES: (2) TCLP = Cleanup objective based on the analysis of the extract from the Toxicity Characteristic Leaching Procedure -- Method 1311 of Test Methods for Evaluating Solid Waste, Third Edition (SW-846).

8. If any collected soil samples are found to contain contaminants at levels higher than the CUOs in Condition 7, then sufficient number of additional samples should be collected and analyzed to clearly determine the horizontal and vertical limits of the soil which exceed the established cleanup objective in and around the tank closure. The procedures used to collect and analyze these samples must be in accordance with those approved by this letter. The procedures used for determining the horizontal and vertical locations from which these samples must be collected shall be in accordance with Sections 13.a and 13.b of the Agency's RCRA closure plan instructions. However, no random sampling shall be used to make this determination.

9. The Agency must be notified in writing if, at any time, it is found that soil contamination above the established cleanup objectives extends to near the water table. This notification must be made within 15 days after such a discovery is made. A plan to investigate for potential groundwater contamination must be submitted to the Agency for review and approval within 60 days after the initial written notification is submitted to the Agency.

10. If groundwater is encountered during the soil sampling activities prior to reaching soil which meets the cleanup objectives, then a plan to investigate for potential groundwater contamination must be submitted to the Agency for review and approval. Such a plan must be submitted within sixty (60) days after the date that the analytical results are received which indicate that soil contamination extends to the water table. In addition, the Agency shall be notified in writing of this discovery within five (5) days after these analytical results are received.

11. If Johnson Controls determines that soil excavation and off-site disposal is not the preferred remedial action for this closure, then the Agency must be notified in writing when such a determination is made. At that time, the Agency will provide Johnson Controls with additional guidance regarding the information which must be submitted to the Agency for review and approval relative to the alternative remedial action which the facility would like to implement.

12. Contaminated soil may be excavated and disposed off-site at any time during closure. The goal of any such effort should be to remove all soil which exceeds the established cleanup objectives.

13. If removal and off-site disposal is the remedial action chosen for any soil contamination found, then all contaminated soil which is excavated for off-site disposal must be: analyzed to determine if it possesses any of the characteristics of hazardous waste as set forth in 35 IAC 721, Subpart C.

    a. If the soil is determined to be a hazardous waste, then it must be managed in accordance with the requirements set forth in Condition 6.a above.

    b. If the soil is determined to be a non-hazardous waste, then it must be managed as a non-hazardous special waste in accordance with 35 IAC 809.

14. If removal and off-site disposal is the remedial action chosen for any soil contamination found, then soil samples must be collected for analysis from the bottom and sidewalls of the final excavation from which contaminated soil was removed. This sampling analysis effort necessary to demonstrate that the remaining soil meets the established cleanup objectives.

    a. A grid system as set forth in Section 13.b of the Agency's closure plan instructions must be established over the excavation.

    b. Samples must be collected from the floor of the excavation at each grid intersection, including intersections along the perimeter of the excavation.

    c. Samples must be collected 6"-12" below the ground surface at each grid intersection around the excavation perimeter. Samples must also be collected at the midpoint of the excavation wall at each grid intersection along the excavation perimeter.

    d. Collection/analysis of all required samples must be in accordance with the procedures approved in this letter.

e. Soil samples which must be analyzed for volatile organic compounds shall be collected using Attachment 7 of the Agency's RCRA closure plan instructions. In addition, such samples must be collected 6"-12" beneath the floor/sidewalls of the excavation to minimize the possibility of volatilization of the contaminants prior to the collection of the samples.

f. No random sampling shall be conducted to verify that the cleanup objectives have been met.

15. If removal and off-site disposal is the remedial action chosen for any soil contamination found, then additional soil must be removed, as necessary, until it can be demonstrated that the remaining soil in and around the area of concern meets the established cleanup objectives. Additional samples must be collected and analyzed in accordance with Condition 14 above from areas where additional soil has been removed.

16. If the Agency determines that implementation of this closure plan fails to satisfy the requirements of 35 Ill. Adm. Code, Section 725.211, the Agency reserves the right to amend the closure plan. Revisions of closure plans are subject to the appeal provisions of Section 40 of the Illinois Environmental Protection Act.

17. If contamination is detected, the Agency must be notified in writing within fifteen (15) days. A revised closure plan addressing remediation of the contamination detected must be submitted within timeframes established by the Agency.

18. Under the provisions of 29 CFR 1910 (51 FR 15,654, December 19, 1986), cleanup operations must meet the applicable requirements of OSHA's Hazardous Waste Operations and Emergency Response standard. These requirements include hazard communication, medical surveillance, health and safety programs, air monitoring, decontamination and training. General site workers engaged in activities that expose or potentially expose them to hazardous substances must receive a minimum of 40 hours of safety and health training off site plus a minimum of three days of actual field experience under the direct supervision of a trained experienced supervisor. Managers and supervisors at the cleanup site must have at least an additional eight hours of specialized training on managing hazardous waste operations.

19. To avoid creating another regulated storage unit during closure, it is recommended that you obtain any necessary permits for waste disposal prior to initiating excavation activities. If it is necessary to store excavated hazardous waste on-site prior to off-site disposal, do so only in containers or tanks for less than ninety (90) days. Do not create regulated waste pile units by storing the excavated hazardous waste in piles. The ninety (90) day accumulation time exemption (35 IAC 722.134) only applies to containers and tanks.

20. Please be advised that the requirements of the Responsible Property Transfer Act (Public Act 85-1228) may apply to your facility due to the management of RCRA hazardous waste. In addition, please be advised that if you store or treat on-site generated hazardous waste in containers or tanks pursuant to 35 IAC 722.134, those units are subject to the closure requirements identified in 35 IAC 722.134(a)(1).

21. All hazardous wastes that result from this project are subject to annual reporting as required in 35 IAC 722.141 and shall be reported to the Agency by March 1 of the following year for wastes treated and left on-site or shipped off-site for storage, treatment and/or disposal during any calendar year. Additional information and appropriate report forms may be obtained from the Agency by contacting:

    Facility Reporting Unit
    Bureau of Land
    Illinois Environmental Protection Agency
    2200 Churchill Road
    P.O. Box 19276
    Springfield, Illinois 62794-9276

22. Based upon a review of the files it appears as though the container storage (S01) identified in the Part A for the facility has never stored for greater than 90 days. As such, this unit will not be required to undergo a RCRA closure. In addition, the hazardous waste treatment (T01) plant identified in the Part A appears to be exempt under the regulations. As such, this unit will also not be required to undergo RCRA closure. This decision supersedes the Agency's January 27, 1992 letter.

23. The attached form entitled RCRA Interim Status Closure and Post-Closure Care Plan General Form (LPC-PA18) must be completed and accompany all information submitted to the Agency associated with the closure activities described in this letter. As noted on this form, two copies must accompany the original of all submittals, so that the information submitted can be distributed, as necessary, to Agency personnel, Agency regional offices and/or USEPA.

Should you have any questions regarding this matter, please contact William T. Sinnott II at 217/524-3300.

Sincerely,

Douglas W. Clay, P.E.
Hazardous Waste Branch Manager
Permit Section, Bureau of Land

bcc: Bureau File
Maywood Region
Jim Moore, CAU
Bill Sinnott

DWC:WTS:bst/sp/57W,1-8

Attachment: Closure Certification Statement
General RCRA Closure General Form

cc: USEPA Region V -- George Hamper

ATTACHMENT

This statement is to be completed by both the responsible officer and by the registered professional engineer upon completion of closure. Submit one copy of the certification with original signatures and three additional copies.

Closure Certification Statement

Closure Log C-720

The hazardous waste storage tank (SO2), at the facility described in this document have been closed in accordance with the specifications in the approved closure plan. I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

USEPA ID Number	Facility Name
Signature of Owner/Operator Date	Name and Title
Signature of Registered P.E. Date	Name of Registered P.E. and Illinois Registration Number
Mailing Address of P.E.:	Registered P.E.'s Seal:

WTS:bst/sp/57W,9

Johnson Controls, Inc.
5757 N. Green Bay Avenue
Post Office Box 591
Milwaukee, WI 53201
Tel. 414/228 1200

~~ILD 005 154 850~~
ILD 980 502 470

JOHNSON CONTROLS

Regional Administrator
U.S. Environmental Protection
Agency - Region 5
230 South Dearborn Street
Chicago, Illinois 60604

December 19, 1986

Re: Liability Coverage for Accidental Occurrences and
Closure and/or Post-Closure Care and Liability Coverage

Dear Sir/Madam:

Enclosed find our financial responsibility letter demonstrating liability coverage for accidental occurrences and closure and/or post-closure liability coverage, a certificate of our independent public accountants, and our 1986 Annual Report.

If you have any questions regarding the information as submitted, please contact the undersigned directly at (414) 228-2241.

Very truly yours,

JOHNSON CONTROLS, INC.

Thomas J. Courtney
Division Counsel

TJC:dlg

Enclosures

RECEIVED
DEC 22 1986
U. S. EPA REGION 5
OFFICE OF REGIONAL ADMINISTRATOR

O. WMD
CC: RF (FED EXP #1171659672

RECEIVED
DEC 23 1986
U.S. EPA, REGION V
WASTE MANAGEMENT DIVISION
HAZARDOUS WASTE ENFORCEMENT BRANCH

since 1885
Right for the Times

ATTACHMENT

Facility Location	EPA Identification Number	Closure Amount	Post-Closure Amount	Closure and Post-Closure Amounts
Battery Division 35 Globe Avenue Route #12 Texarkana, Arkansas 75502	ARD055790273	3320	-0-	3320
Battery Division North Broad Street Middletown, Delaware 19709	DED002353092	6080	-0-	6080
Battery Division 1550 E. Kimberley Avenue Fullerton, California 92634	CAD008323388	9950	-0-	9950
Battery Division 10215 30th Street Tampa, Florida 33687	FLD004090452	11060	-0-	11060
Battery Division 300 South Glengarry Drive Geneva, Illinois 60134	ILD005159850	16580	-0-	16580
Control Products Division 1302 East Monroe Street Goshen, Indiana 46526	IND009549593	6640	-0-	6640
Battery Division 3200 Fern Valley Road Louisville, Kentucky 40213	KYD006382394	17680	-0-	17680
Battery Division 951 Aiken Road Owosso, Michigan 48867	MID058816927	464280	-0-	464280
Battery Division 4722 Pear Street St. Joseph, Missouri 64502	MOD000677252	15470	-0-	15470
Battery Division 10300 Industrial Road Holland, Ohio 43528	OHD000723510	9950	-0-	9950
Panel Division Highway 59 Poteau, Oklahoma 74953	OKD006354013	-0-	-0-	-0-

ATTACHMENT
PAGE 2

Facility Location	EPA Identification Number	Closure Amount	Post-Closure Amount	Closure and Post-Closure Amounts
Battery Division Canby Industrial Park Canby, Oregon 97013	ORD010746402	78940	-0-	78940
Battery Division 5757 N. Green Bay Ave. Glendale, Wisconsin 53209	WID000808865	-0-	-0-	-0-
Battery Division Facilities located in Milwaukee, Wisconsin, at:				
900 East Keefe Avenue Milwaukee, WI 53212	WID000808840	3320	-0-	3320
5400 N. Teutonia Avenue Milwaukee, WI 53209	WID000808857	1110	-0-	1110
3238 N. Bremer Street Milwaukee, WI 53212	WID560011116	2210	-0-	2210
Systems & Services Division 3713 N. Humboldt Street Milwaukee, Wisconsin 53212	WIT560010191	21940	-0-	21940
Systems & Services Division 507 East Michigan Street Milwaukee, Wisconsin 53202	WIT560010183	2210	-0-	2210
Control Products Division 1007 S. 12th Street Watertown, Wisconsin 53094	WID020470621	8850	-0-	8850

1500 Marine P
Milwaukee, W 02

Telephone 414 276 9500

Price Waterhouse

December 19, 1986

Mr. William L. Rootham
Executive Vice President and
Chief Financial Officer
Johnson Controls, Inc.
and
Illinois Environmental Protection
Agency

We have examined the consolidated financial statements of Johnson Controls, Inc. for the year ended September 30, 1986 and have issued our report thereon dated October 30, 1986. We are independent accountants with respect to Johnson Controls, Inc. and our examination was made in accordance with generally accepted auditing standards and accordingly included such tests of the accounting records and such other auditing procedures as we considered necessary in the circumstances.

At your request we have read Mr. Rootham's letter dated December 19, 1986 addressed to the Illinois Environmental Protection Agency and have performed the following procedures with respect to "Alternative II" on pages 6 and 7 of such letter.

a) We recalculated the computation of the balance as set forth on lines 5 and 6 of page 6 and lines 7 and 8 of page 7 using information appearing in the September 30, 1986 consolidated financial statements.

b) We recalculated the computation called for on line 9 of page 6 and line 11 of page 7, noting the propriety of the responses.

Nothing came to our attention as a result of the foregoing procedures that caused us to believe that the balances and the responses set forth on the lines noted above are incorrect.

Price Waterhouse

1500 Marine P
Milwaukee, W. .02

Telephone 414 276 9500

Price Waterhouse

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Price Waterhouse

LETTER FROM CHIEF FINANCIAL OFFICER

(To demonstrate liability coverage and/or to demonstrate both liability coverage and assurance of closure and/or post-closure care.)

Director
Illinois Environmental Protection Agency
2200 Churchill Road
Springfield, Illinois 62706

Dear Sir or Madam:

I am the chief financial officer of Johnson Controls, Inc. with principal offices located at 5757 North Green Bay Avenue, P.O. Box 591, Milwaukee, WI 53201. (1)
This letter is in support of the use of the financial test to demonstrate financial responsibility for liability coverage and closure and/or post-closure care (2) as specified in Subpart H of 40 CFR Parts 264 and 265 and/or Subpart H of 35 Illinois Administrative Code Parts 724 and 725.

The owner or operator identified above is the owner or operator of the following facilities for which liability coverage is being demonstrated through the financial test specified in Subpart H of 40 CFR Parts 264 and 265 and/or tests equivalent or substantially equivalent, and/or Subpart H of 35 Illinois Administrative Code Parts 724 and 725:

USEPA I.D. No. SEE ATTACHMENT (3)

Name

Address

Please attach a separate page if more space is needed for all facilities.

See Instruction (4)

1. This firm is the owner or operator of the following facilities for which financial assurance for closure and/or post-closure care is demonstrated through the financial test specified in Subpart H of 35 Ill. Adm. Code Parts 724 and 725. The current closure and/or post-closure cost estimates covered by the test are shown for each facility: (LIST ALL THE ILLINOIS FACILITIES USING THE FINANCIAL TEST)

USEPA I.D. No. (5)	Closure Amount (6)	Post-Closure Amount (7)	Closure and Post-Closure Amounts (8)
Name Battery Division Address 300 South Glengarry Drive City Geneva, Illinois 60134 USEPA I.D. No. ILD005159850	16580	-0-	16580
Name Address City			

This Agency is authorized to require this information under Illinois Revised Statutes, 1981, Chapter 111 1/2, Section 21(f). Disclosure of this information is required. Failure to do so may result in a civil penalty not to exceed $25,000 per day of violation. Falsification of this information may constitute a Class 4 felony, which also carries a fine of up to $25,000 per day of violation for the first offense. This form has been approved by the Forms Management Center.

USEPA I.D. No. _____

Name _____

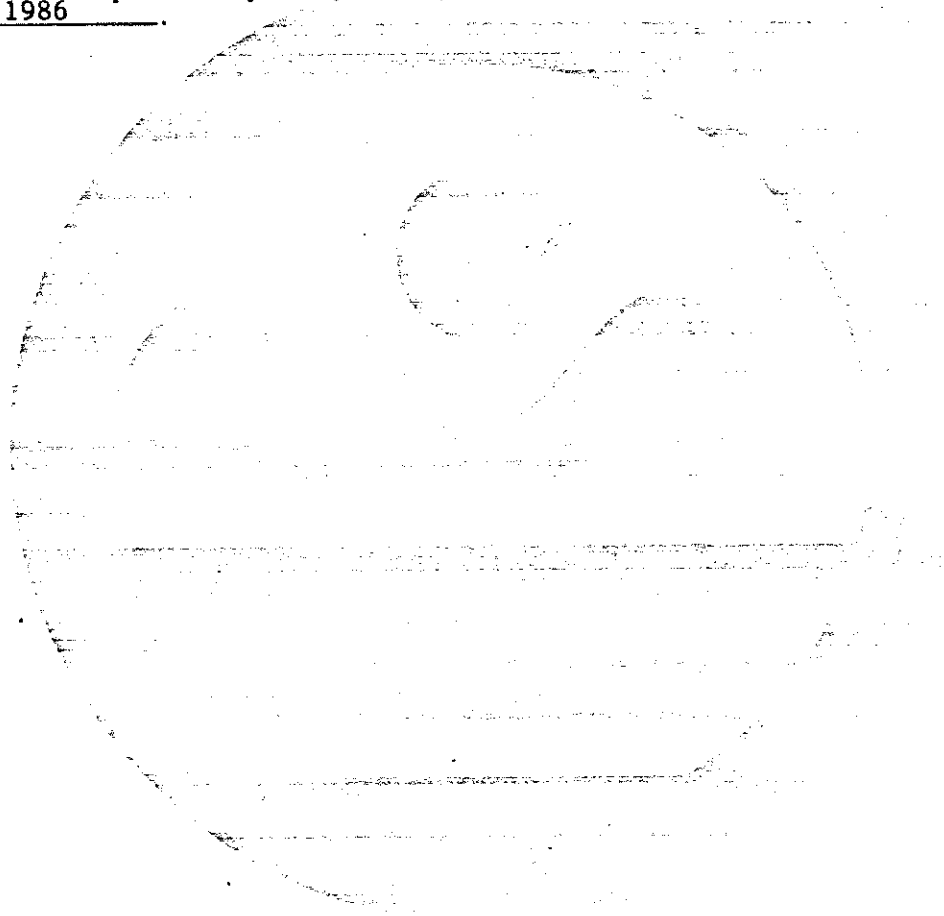
Address _____

City _____

Please attach a separate page if more space is needed for all facilities.

This owner or operator is required (9) to file a Form 10K with the Securities and Exchange Commission (SEC) for the latest fiscal year.

The fiscal year of this owner or operator ends on September 30th (10) *. The figures for the following items marked with an asterisk are derived from this owner's or operator's independently audited, year-end financial statements for the latest completed fiscal year, ended September 30, 1986 (11).



Part B. Closure or Post-Closure Care and Liability Coverage (See Instructions 14 and 15)

Alternative II

1.	Sum or current closure and post-closure cost estimates (total of all cost estimates listed above)	$ 679,590
2.	Amount of annual aggregate liability coverage to be demonstrated	$ 5,000,000
3.	Sum of lines 1 and 2	$ 5,679,590
4.	Current bond rating of most recent issuance and name of rating service	A Standard & Poor's
5.	Date of issuance of bond	December 31, 1985
6.	Date of maturity of bond	December 1, 2005
*7.	Tangible net worth (if any portion of the closure or post-closure cost estimates is included in "total liabilities" on your financial statements you may add that portion to this line)	$ 628,474,000
*8.	Total assets in the U.S. (required only is less than 90% of assets are located in the U.S.)	$ 1,458,739,000

		Yes	No
9.	Is line 7 at least $10 million?	X	
10.	Is line 7 at least 6 times line 3?	X	
*11.	Are at least 90% of assets located in the U.S.? If not, complete line 12.		X
12.	Is line 8 at least 6 times line 3?	X	

Signature Wm. L. Rootham

Typed name William L. Rootham

Title Chief Financial Officer

Date December 19, 1986

For original see MID 058 816 927

Johnson Controls, Inc.
5757 N. Green Bay Avenue
Post Office Box 591
Milwaukee, WI 53201
Tel. 414/228 1200

~~ILD005 459 858~~
ILD980502470

JOHNSON CONTROLS

December 23, 1985

Regional Administrator
U.S. Environmental Protection
Agency - Region 5
230 South Dearborn Street
Chicago, Illinois 60604

Re: Liability Coverage for Accidental Occurrences and
Closure and/or Post-Closure Care and Liability Coverage

Gentlemen:

Enclosed find our financial responsibility letter demonstrating liability coverage for accidental occurrences and closure and/or post-closure liability coverage signed by William L. Rootham, Executive Vice President and Chief Financial Officer of Johnson Controls, Inc., a certificate of our independent public accountants and the 1985 Annual Report of our company.

If you have any questions regarding the information as submitted, do not contact Mr. Rootham, contact the undersigned directly at (414) 228-2270.

Very truly yours,

JOHNSON CONTROLS, INC.

Irene E. Bialas
Division Counsel

IEB:blh

Enclosures

RECEIVED
DEC 30 1985
EPA REGION 5
OFFICE OF REGIONAL
ADMINISTRATOR

since 1885
Right for the Times

2. The owner or operator identified above guarantees, through the corporate guarantee specified in Subpart H of 40 CFR Parts 264 and 265, the closure and post-closure care of the following facilities owned or operated by its subsidiaries. The current cost estimates for the closure or post-closure care so guaranteed are shown for each facility:

Not Applicable.

3. In States where EPA is not administering the financial requirements of Subpart H of 40 CFR Parts 264 and 265, this owner or operator is demonstrating financial assurance for the closure or post-closure care of the following facilities through the use of a test equivalent to or substantially equivalent to the financial test specified in Subpart H of 40 CFR Parts 264 and 265. The current closure and/or post-closure cost estimates covered by such a test are shown for each facility:

Facility Location	EPA Identification Number	Closure Estimate
Battery Division 10300 Industrial Road Holland, Ohio 43528	OHD000723510	9720
Systems & Services Division 3713 N. Humboldt Street Milwaukee, Wisconsin 53212	WIT560010191	21430
Systems & Services Division 507 East Michigan Street Milwaukee, Wisconsin 53202	WIT560010183	2160
Control Products Division 1007 S. 12th Street Watertown, Wisconsin 53094	WID020470621	8640
Battery Division 5757 N. Green Bay Ave. Glendale, Wisconsin 53209	WID000808865	-0-
Battery Division 300 South Glengarry Dr. Geneva, Illinois 60134	ILD005159850	16190
Battery Division Facilities located in Milwaukee, Wisconsin, at:		
900 East Keefe Avenue	WID000808840	3240
5400 N. Teutonia Avenue	WID000808857	1080
3238 N. Bremer Street	WID560011116	2160

C.2 Compliance and Enforcement

Waste, Pesticides and Toxics Division

Type of Document:
- ☐ Notice of Violation and Inspection Report/Checklist
- ☒ No Violation Letter and Inspection Report/Checklist
- ☐ Letter of Acknowledgment
- ☐ Information Request
- ☐ Pre-Filing and Opportunity to Confer
- ☐ State Notification of Enforcement Action

Facility Name : Johnson Controls Battery Group

Facility Location: 300 South Glengarry Drive

City: Geneva **State:** IL

U.S. EPA ID# ILD 980 502 470

Assigned Staff SMITH **Phone:**

Name	Signature	Date
Author	Richard Clean Smith	10-12-04
Regional Counsel		
Section Chief	Steven Bourgeois	10/14/04
Branch Chief		

Directions/Request for Clerical Support:

After the Section Chief/Branch Chief signs this sheet and original letter:

1. Date stamp the cover letter;
2. Make four copies of the contents of this folder:
   - One copy for the assigned staff;
   - One copy for the section file;
   - One copy for the branch file; and
   - One copy for the official file.
3. Make any additional copies for cc's or bcc's.
4. Mail the original certified mail and distribute office copies and cc's and bcc's.

Once the certified mail receipt is returned:

5. File the certified mail receipt (green card), with this sign-off sheet and the official file copy, and take to 7th floor RCRA file room;
6. E-mail staff the date that the letter was received by facility.

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5
77 WEST JACKSON BOULEVARD
CHICAGO, IL 60604-3590

OCT 15 2004

REPLY TO THE ATTENTION OF:

DE-9J

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Mr. Thomas Schoen
Plant Engineering Manager
Johnson Controls Battery Group
300 South Glengarry Drive
Geneva, Illinois 60134

Re RCRA Compliance Inspection
Johnson Controls Battery Group
EPA ID No.: ILD 980 502 470

Dear Mr. Schoen:

On July 19, 2004, your facility located in Geneva, Illinois, was inspected by a United States Environmental Protection Agency (U.S. EPA) representative. The purpose of the inspection was to evaluate compliance with certain requirements of the Resource Conservation and Recovery Act (RCRA); specifically, those regulations or permit conditions related to the generation and management of hazardous waste. A copy of the inspection report is enclosed for your reference.

Based on information provided by your personnel, review of records, and physical observations of the inspector, at the time of the investigation, it was determined that your facility is engaged in the management of hazardous waste. As of this writing, our review of the inspection has not resulted in the detection of violations of any of the specific RCRA requirements under examination.

This determination does not limit the applicability of either the requirements examined or other RCRA regulations. Your installation will continue to be evaluated by U.S. EPA and the Illinois Environmental Protection Agency in the future.

If you have any questions and/or concerns regarding this matter, please contact Robert Dean Smith, of my staff, at (312) 886-7568.

Sincerely yours,

for Lorna M. Jereza, P.E., Chief
Compliance Section 1
Enforcement and Compliance Assurance Branch

Enclosure

cc: Todd Marvel, IEPA

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY - REGION 5
WASTE, PESTICIDES AND TOXICS DIVISION
ENFORCEMENT AND COMPLIANCE ASSURANCE BRANCH

COMPLIANCE EVALUATION INSPECTION REPORT

FACILITY NAME:	Johnson Controls Battery Group ILD 980 502 470
FACILITY ADDRESS:	300 South Glengarry Drive Geneva, Illinois 60134
OPERATOR:	Johnson Controls, Inc.
FACILITY TYPE:	LQG
FACILITY REPRESENTATIVES:	Thomas J. Schoen Plant Engineering Manager Thomas R. Kreider Plant Manager
US EPA INSPECTOR:	Robert Dean Smith, Environmental Scientist
DATE OF INSPECTION:	July 19, 2004
NAICS CODE:	335911
INSPECTION PRIORITY, SECTOR AND/OR PROCESS:	Storage Battery Manufacturing
AUTHOR:	Robert Dean Smith, LPG RDS
THROUGH:	Lorna M. Jereza, P.E., Chief, CS-1
DATE:	October 8, 2004

FACILITY BACKGROUND

Johnson Controls Battery Group (JCBG) manufactures lead acid batteries. The facility was built in 1960 and the first production was in 1961. JCBG employs about 300 persons which fluctuates +/- 25 from the busy season (summer/fall) to the slow season in winter. A very cold winter is good business which depletes the stock of batteries manufactured ahead of time during the busy season. Approximately 4,000,000 batteries are manufactured each year.

JCBG consumes a large quantity of lead and recycles its by products and lead waste. JCBG has been dedicated to waste reduction for many years and the amount of hazardous waste has been declining accordingly. JCBG ships its lead waste to Gopher Resources (Gopher) in Eagan, Minnesota, for reclamation.

Waste sulphuric acid is generated only if someone drops a battery and it breaks open. The spill is neutralized and collected.

Facility inspection

After presenting my credentials to Mr. Schoen, Plant Engineering Manager, we discussed the

background of the facility operations and waste generation. After a short discussion, we walked through the facility to see the manufacturing of batteries and the generation/accumulation of hazardous waste.

We visited seven satellite accumulation areas while walking through the manufacturing area. Each area was properly managed with labels on the containers and closed. The waste in these areas include used personal protection equipment (PPE) which is sent to Gopher. Baghouse dust is generated by a vacuum system that removes production excesses. The baghouse dust also is sent to Gopher.

We visited the oxide mills where lead, either virgin or recycled from Gopher, is melted and turned into lead oxide. The main ingredient of the battery are lead plates that are covered with an oxide paste.

Less than 90 day accumulation area

The less than 90 day accumulation area is located on the south side of the facility. In general, the hazardous waste the facility generates is found as floor sweepings and used PPE. At the time of the inspection, 18 pallets of four 55-gallon drums were present with one pallet with only two drums. The oldest date was June 15, 2004. All drums were properly labeled, closed, and stored for ease of inspection. Used oil was present as well as three 55-gallon plastic drums of waste acid.

Adjacent to the less than 90 day accumulation area was the QA/QC lab were returned batteries are examined to determine the reason for failure. Batteries manufactured here as well as at other plants are examined. Batteries for lawn tractors and marine batteries were present in addition to the automobile batteries.

Battery warehouse

We walked through the battery warehouse before returning to the office to examine the facility's paperwork. JCBG stores approximately 400,000 batteries in the building. The warehouse is set up to keep a charge on the batteries.

Paperwork review

The hazardous waste manifests were examined. No concerns were identified.

Inspection logs were examined and no concerns were identified.

The training records were largely computerized. The training provided is very specific to the jobs performed. At the time of the inspection, annual training was scheduled for the following Wednesday. No concerns were identified.

The hazardous waste characterization documents were also computerized. No concerns were identified.

The contingency plan was also found to be in good order.

Final observations

The facility has not been subjected to a hazardous waste inspection under the Resource Conservation and Recovery Act, as amended, in several years. The facility was able to provide all required paperwork but at times the production was relatively slow. This is not unusual for facilities that are not accustomed to regular inspections. It is recommended that JCBG refers to the inspection checklist to organize the paperwork so that it is easily accessed when next subjected to an inspection.

Johnson Controls Battery 300 S. Glengarry Geneva, IL 60134

ILD 980 502 470

Regulation	RCRA GENERATOR INSPECTION CHECKLIST (PART 722) 7/19/04	Violation
	PART 722: STANDARDS APPLICABLE TO GENERATORS OF HAZARDOUS WASTE (>1000 KG/MO.)	
	SUBPART A: GENERAL	
722.111 (262.11) P	**Section 722.111 Hazardous Waste Determination** Has the generator correctly determined if the solid waste(s) it generates is a hazardous waste? Yes ✓ No ___ N/A ___ Have hazardous wastes been identified for purposes of compliance with Part 728? Yes ✓ No ___ N/A ___	722.111
808.121(a)	Has the generator correctly determined if the solid waste(s) it generates is a special waste? Yes ✓ No ___ N/A ___	808.121(a)
722.112(a) (262.12) P	**Section 722.112 USEPA Identification Numbers** Has the generator obtained a USEPA identification number? Yes ✓ No ___ N/A ___	722.112(a)
722.112(c) (262.12) N/A P	Has the generator offered its hazardous waste only to transporters or to treatment, storage or disposal facilities that have a USEPA identification number? Yes ✓ No ___ N/A ___	722.112(c)
P	**SUBPART B: THE MANIFEST**	
722.120(a) (262.20)	**Section 722.120 General Requirements** Does the facility manifest its waste off-site? Yes ✓ No ___ N/A ___	722.120(a)
722.120(b) (262.20)	Does the manifest designate a facility permitted to handle the waste? Yes ✓ No ___ N/A ___	722.120(b)
722.120(d) (262.20)	Has the generator shipped any waste that could not be delivered to the designated facility? Yes ___ No ✓ N/A ___	722.120(d)
722.121(a) (262.21)	**Section 722.121 Acquisition of Manifests** Has the generator used: – an Illinois manifest for wastes designated to a facility within Illinois? Yes ✓ No ___ N/A ___	722.121(a)
722.121(b) (262.21)	– a manifest from the State to which the manifest is designated? Yes ✓ No ___ N/A ___ – an Illinois manifest if the State to which the waste is designated has no manifest of its own? Yes ✓ No ___ N/A ___	722.121(b)
722.122 (262.22)	**Section 722.122 Number of Copies** Does the manifest consist of at least 6 copies? Yes ✓ No ___ N/A ___	722.122
722.123(a) (262.23)	**Section 722.123 Use of the Manifest** For each manifest reviewed, has the generator: – signed the certificate by hand? Yes ✓ No ___ N/A ___ – obtained the handwritten signature and the date of acceptance by the initial transporter? Yes ✓ No ___ N/A ___ – retained one copy as required by Section 722.140(a)? Yes ✓ No ___ N/A ___ – apparently sent a copy (part 5 for the Illinois manifest) to the Agency within 2 working days? Yes ✓ No ___ N/A ___	722.123(a)
722.123(b) (262.23)	– has the generator apparently given the remaining copies to the transporter? Yes ✓ No ___ N/A ___	722.123(b)

Regulation	RCRA GENERATOR INSPECTION CHECKLIST (PART 722)	Violation
722.123(c) (263.23)	– has the generator followed the procedures prescribed in Section 722.123 for manifesting bulk shipments of hazardous waste by rail or water? Yes_____ No_✓_ N/A_____	722.123(c)
(262.30 - 263.33) I	**SUBPART C: PRE-TRANSPORT REQUIREMENTS** Is there any hazardous waste ready for transport off-site? Yes_✓_ No_____ N/A_____ If so, is the generator complying with the pre-transport requirements in Subpart C? Yes_✓_ No_____ N/A_____	
722.134(a) (262.34)	**Section 722.134 Accumulation Time** Has the generator complied with the following requirements: Yes_____ No_____ N/A_____	722.134(a)
722.134(a)(1) (262.34	A) For waste in containers, has the generator complied with the requirements of Part 725, Subpart I? Yes_✓_ No_____ N/A_____ and/or B) For waste in tanks, has the generator complied with the requirements of Part 725, Subpart J (except Sections 725.297(c) and 725.300)? Yes_____ No_____ N/A_✓_ and/or C) For waste on drip pads, has the generator complied with the requirements of Part 725, Subpart W and maintained the required records identified in this subsection? Yes_____ No_____ N/A_✓_ and/or D) For waste in containment buildings, has the generator complied with Part 725, Subpart DD and maintained the required records identified in this subsection? Yes_____ No_____ N/A_✓_	
722.134(a)(2) (262.34) I	For waste in containers, has the generator marked and made visible for inspection on each container, the date upon which accumulation began? Yes_✓_ No_____ N/A_____	
722.134(a)(3) (262.34)	For waste in containers and tanks, has the generator marked or labeled each with the words "Hazardous Waste"? Yes_✓_ No_____ N/A_____	
722.134(a)(4) (262.34)	Has the generator complied with the requirements of Part 725, Subparts C and D, and Sections 725.116 and 728.107(a)(4)? Yes_✓_ No_____ N/A_____	
	Specifically, the requirements of items 1 and/or 4 above (listed by regulation) which need to be complied with are as follows: Does the facility accumulate hazardous waste in containers? Yes_✓_ No_____ N/A_____ If "No", go to Subpart J.	
	SUBPART I: USE AND MANAGEMENT OF CONTAINERS	
(725.211) (265.111) (725.214) (265.114)	Has the generator closed an accumulation area? Yes_____ No_✓_ N/A_____ If "Yes", was the accumulation area closed in accordance with Sections 725.211 and 725.214? Yes_____ No_____ N/A_____	
(725.271) (265.171) I	If the containers have leaked or are in poor condition, has the owner/operator transferred the hazardous waste to a suitable container? Yes_✓_ No_____ N/A_____	
(725.272) (265.172) I	Is the waste compatible with the container and/or liner? Yes_✓_ No_____ N/A_____	
(725.273a) (265.173) I	Are containers of hazardous waste always closed except to remove or add waste during accumulation? Yes_✓_ No_____ N/A_____	

Regulation	RCRA GENERATOR INSPECTION CHECKLIST (PART 722)	Violation
(725.273b) (265.173)	Are containers of hazardous waste being opened, handled, or stored in a manner which will prevent the rupture of the container or prevent it from leaking? Yes ✓ No N/A	
(725.274) P (265.174) I	Is the owner/operator inspecting the accumulation area(s) at least weekly, looking for leaks or deterioration? Yes ✓ No N/A Is the accumulation area free from any evidence of leaking or deteriorating containers? (See also Section 725.131) Yes ✓ No N/A	
(725.276) I (265.176)	Are containers holding ignitable or reactive wastes located at least 15 meters (50 feet) from the facility's property line? Yes ✓ No N/A **Note:** See Section 725.117(a) for additional requirements for ignitable, reactive or incompatible wastes.	
(725.277) I (265.177)	Is the owner/operator complying with the requirements concerning incompatible wastes? Yes No N/A ✓ COMMENTS:	
Q	Does the generator accumulate and/or treat hazardous waste in tanks? Yes No N/A **Note:** If "No", go to Subpart C.	
	SUBPART J: TANK SYSTEMS Has the generator closed an accumulation area? Yes No N/A	
(725.211) (265.111) (725.214) (265.114)	If "Yes", was the accumulation area closed in accordance with Sections 725.211 and 725.214? Yes No N/A	
(725.290) (265.190)	Does the facility accumulate or treat hazardous waste in tanks? Yes No N/A **Note:** A generator may treat hazardous waste in a tank for less than 90 days without a RCRA permit. If "No", skip Subpart J. a) Tank systems that are used to accumulate or treat hazardous waste which contains no free liquids (using the Paint Filter Liquids Test) and that are situated inside a building with an impermeable floor are exempted from the requirements in Section 725.293. b) Tank systems, including sumps, that serve as part of a secondary containment system to collect or contain releases of hazardous wastes are exempted from the requirements in Section 725.293(a). c) Tanks, sumps and other collection devices used in conjunction with drip pads (as defined in Section 720.110) and regulated under Subpart W, must meet the requirements of this Subpart.	
TANKS		
(725.291a) (265.191)	For tanks **existing** prior to July 14, 1986 (see definition of tank system under 720.110) and not protected by a secondary containment system, has a written assessment been reviewed and certified by an IRPE(*) in accordance with Section 702.126(d) by January 12, 1988 [except as provided in Section 725.291(c)]? Yes No N/A	

Regulation	RCRA GENERATOR INSPECTION CHECKLIST (PART 722)	Violation
(725.291b) (265.191) TANKS	Does this assessment consider at least the following: 1) design standards for the tank and ancillary equipment? Yes_____ No_____ N/A_____ 2) hazardous characteristics of the wastes? Yes_____ No_____ N/A_____ 3) existing corrosion protection measures? Yes_____ No_____ N/A_____ 4) documented age of the tank system? Yes_____ No_____ N/A_____ 5) results of a leak test, internal inspection, or other tank integrity examination? Yes_____ No_____ N/A_____ *IRPE = Independent Registered Professional Engineer	
(725.291c) (265.191)	Has a tank system assessment been performed within 12 months after the materials in the tank become a hazardous waste? Yes_____ No_____ N/A_____ **Note:** If an assessment indicates a tank system is leaking or unfit for use, the owner/operator must comply with the requirements of Section 725.291(b)(5).	
(725.292a) (265.192)	For **new** tanks (see definition of new tanks under Section 720.110) whose installation commenced after 07/14/86, has a written assessment been reviewed and certified by an IRPE in accordance with Section 702.126(d) prior to operation of the tank system? Yes_____ No_____ N/A_____ Does the assessment include, at a minimum, the following: 1) design standards for tanks and ancillary equipment? Yes_____ No_____ N/A_____ 2) hazardous characteristics of the waste(s) to be handled? Yes_____ No_____ N/A_____ 3) evaluation of potential for corrosion and corrosion protection measures for tank systems with metal components in contact with soil or water? Yes_____ No_____ N/A_____ 4) design or operational measures that will protect underground tank systems from potential damage resulting from vehicular traffic? Yes_____ No_____ N/A_____ 5) designs to ensure adequate foundations, anchoring to prevent flotation or dislodgment and the ability to withstand the effects of frost heave? Yes_____ No_____ N/A_____	
(725.292g) (265.192)	Has the owner/operator obtained and kept on file at the facility the written statements, including the certification statements [as required in Section 702.126(d)] of the design and installation requirements of Subsections (b) through (f)? Yes_____ No_____ N/A_____	
(725.293a) (265.193)	Is secondary containment provided for any new tank system before being put into service? Yes_____ No_____ N/A_____ Does an existing tank, used to accumulate F020, F021, F022, F023, F026 or F027 waste(s), have secondary containment by 1/12/89? Yes_____ No_____ N/A_____ For an existing tank of documentable age, is secondary containment provided by 1/12/89 or when the tank is 15 years old, whichever is later? Yes_____ No_____ N/A_____ For an existing tank of undocumentable age, has secondary containment been provided by 1/12/95? Yes_____ No_____ N/A_____ or if the facility is older than 7 years, by the time the facility reaches 15 years of age or 1/12/89, whichever is later? Yes_____ No_____ N/A_____ For tanks that accumulate wastes that become hazardous after 1/12/87, has secondary containment been provided within the time intervals required in Subsections (a)(1) through (a)(4) substituting the date that a material becomes a hazardous waste for 1/12/87? Yes_____ No_____ N/A_____	

Regulation	RCRA GENERATOR INSPECTION CHECKLIST (PART 722)	Violation
(725.293b) (265.193) TANKS	Is the secondary containment system designed, installed and operated to prevent migration of wastes or accumulated liquid out of the system at any time? Yes_____ No_____ N/A_____ Is the secondary containment system capable of detecting and collecting releases and accumulated liquids until the collected material is removed? Yes_____ No_____ N/A_____	
(725.293c) (265.193)	To meet the requirements of Subsection (b), is the secondary containment system: 1) compatible with the waste(s) in the tank and of sufficient strength and thickness to prevent failure? Yes_____ No_____ N/A_____ 2) placed on a foundation or base capable of providing support, providing resistance to pressure gradients and preventing failure due to settlement, compression of uplift? Yes_____ No_____ N/A_____ 3) provided with a leak detection system designed and operated to detect any release or accumulated liquid within 24 hours? Yes_____ No_____ N/A_____ 4) sloped or otherwise designed or operated to drain and remove liquids resulting from leaks, spills or precipitation? Yes_____ No_____ N/A_____ and is spilled or leaked waste and accumulated precipitation removed from the secondary containment within 24 hours? Yes_____ No_____ N/A_____ **Note:** A RCRA permit may allow for removal of liquids less frequently than 24 hours after accumulation.	
(725.293d) (265.193)	Does the secondary containment for tanks have one or more of the following: 1) a liner (external to the tank); or 2) a vault; or 3) a double-walled tank; or 4) an equivalent device (approved by the Board)? Yes_____ No_____ N/A_____	
(725.293e) (265.193)	Does the external liner system(s), vault system(s) and/or double-walled tank(s) meet the additional requirements identified in Section 725.293(e)? Yes_____ No_____ N/A_____	
(725.293f) (265.193)	Is ancillary equipment protected by secondary containment that meets the requirement of Subsection (h) and (c)? Yes_____ No_____ N/A_____ If "No": 1) Is aboveground piping (exclusive of flanges, joints, valves and connections) inspected daily? Yes_____ No_____ N/A_____ 2) Are welded flanges, joints and connections inspected daily? Yes_____ No_____ N/A_____ 3) Are sealless or magnetic coupling pumps and sealless valves inspected daily? Yes_____ No_____ N/A_____ 4) Are pressurized aboveground piping systems with automatic shut-off devices inspected daily? Yes_____ No_____ N/A_____	
(725.293i) (265.193	Until such time as secondary containment is provided, are the following requirements being met for all tank systems: 1) For non-enterable underground tanks, has an annual leak test that meets the requirements of 725.291(b)(5) been conducted? Yes_____ No_____ N/A_____ 2) For other than non-enterable underground tanks and ancillary equipment, has an annual leak test, internal inspection or other tank integrity examination by an IRPE been conducted? Yes_____ No_____ N/A_____ 3) Are written records maintained at the facility to document the assessments required under Subsections (i)(1) and (i)(2)? Yes_____ No_____ N/A_____ **Note:** If a tank system is found to be leaking or unfit for use as a result of a leak test or assessment, the owner/operator must comply with Section 725.296.	

TANK

Regulation	RCRA GENERATOR INSPECTION CHECKLIST (PART 722)	Violation
(725.294a) (265.194)	Has the owner/operator placed hazardous wastes or treatment reagents in the tank system that could cause the system to rupture, leak, corrode or otherwise fail? Yes_____ No_____ N/A_____	
(725.294b) (265.194)	Do tanks and secondary containment have appropriate controls and practices to prevent spills and overflows including: 1) spill prevention controls? Yes_____ No_____ N/A_____ 2) overfill prevention controls? Yes_____ No_____ N/A_____ 3) sufficient freeboard in uncovered tanks? Yes_____ No_____ N/A_____	
(725.294c) (265.194)	**Note:** If a leak or spill has occurred in the tank system, the owner/operator shall comply with the requirements of Section 725.296.	
(725.295a) (265.195)	Does the owner/operator inspect, if present, at least each operating day, the following: 1) overfill/spill control equipment? Yes_____ No_____ N/A_____ 2) the aboveground portion of the tank system for corrosion or releases? Yes_____ No_____ N/A_____ 3) data from monitoring equipment? Yes_____ No_____ N/A_____ 4) the construction materials and the area immediately surrounding the external portion of the system? Yes_____ No_____ N/A_____	
(725.295b) (265.195)	If the tank system has cathodic protection, is the owner/operator complying with Section 725.295(b) to ensure that they are functioning properly? Yes_____ No_____ N/A_____	
(725.295c) (265.195)	Does the owner/operator document in the operating record, the results of tank inspections as required in Section 725.295(a) and (b)? Yes_____ No_____ N/A_____	
(725.296) (265.196)	If the tank system or secondary containment system has a leak or spill or is unfit for use, has the owner/operator: a) immediately ceased using; prevented flow or addition of waste and inspected the system to determine the cause of the release? Yes_____ No_____ N/A_____ b) removed applicable waste from the system within 24 hours of detection? Yes_____ No_____ N/A_____ c) immediately conducted a visual inspection of the release and taken actions to contain visible releases to the environment, prevented further migration to soils or surface water and removed and properly disposed of any contaminated soil or water? Yes_____ No_____ N/A_____	
(725.296d) (265.196)	d) notified the Agency within 24 hours of detection of release? Yes_____ No_____ N/A_____ d)3) within 30 days of detection of release, submitted a report to the Agency that complies with the requirements of Section 725.296(d)(3)? Yes_____ No_____ N/A_____ **Note:** Notification and reports are not necessary if less than 1 pound of material is spilled and it was immediately contained and cleaned up.	

TANK

Regulation	RCRA GENERATOR INSPECTION CHECKLIST (PART 722)	Violation
(725.296e) (265.196)	e) repaired the tank system prior to returning the tank system to service in the event that a leak has occurred from the primary tank system into the secondary containment system? Yes_____ No_____ N/A_____ e)4) provided secondary containment before returning a tank system to service in the event that the release was from a component of a tank system without secondary containment? Yes_____ No_____ N/A_____ e)4) met the requirements for a new tank system in the event that a component is replaced during repair? Yes_____ No_____ N/A_____ e)4) provided the entire component with secondary containment prior to being returned to use in the event that a leak has occurred in any portion of a component that is not readily accessible for visual inspection? Yes_____ No_____ N/A_____	
(725.296f) (265.196)	f) In the event that an extensive repair has been conducted in accordance with subsection (e), submitted to the Agency within 7 days after returning the tank system to use, a certification by an IRPE stating that the repaired system is capable of handling hazardous wastes without release for the intended life of the system? Yes_____ No_____ N/A_____ **Note:** If the owner/operator does not satisfy the requirements of subsections (e)(2) through (e)(4), the tank system must be closed in accordance with Section 725.297.	--
(725.297a) (265.197)	At the time of closure of a tank system, has the owner/operator removed or decontaminated all waste residues, contaminated components, contaminated soils and structures and equipment and managed them as hazardous waste [unless Section 721.103(d) applies]? Yes_____ No_____ N/A_____	
(725.297a) (265.197)	Have the closure plan, closure activities, cost estimates for closure and financial responsibility for tank systems met all requirements specified in Subparts G and H? Yes_____ No_____ N/A_____	
(725.297b) (265.197)	If the tank system cannot be "clean" closed, has the owner/operator closed the tank system and performed post-closure care in accordance with the closure and post-closure care requirements that apply to landfills (Section 725.410)? Yes_____ No_____ N/A_____ **Note:** Such a tank system is considered a landfill and must meet all of the requirements of landfills specified in Subparts G and H.	
(725.298a) (265.198)	Are ignitable or reactive wastes placed in a tank system? Yes_____ No_____ N/A_____ If "No", skip to Section 725.299. Is the waste treated, rendered or mixed before or immediately after placement in the tank system so that: – the resulting waste, mixture or dissolved material is no longer ignitable or reactive? Yes_____ No_____ N/A_____ – Section 725.117(b) is complied with? Yes_____ No_____ N/A_____ or Is the waste accumulated or treated so that it is protected from any material or conditions which may lead to ignition or reaction? Yes_____ No_____ N/A_____ or Is the tank used solely for emergencies? Yes_____ No_____ N/A_____	
(725.298b) (265.198)	Is the facility complying with the requirements regarding maintenance of protective distances between the waste management area and any public ways, streets, alleys or any adjoining property line? Yes_____ No_____ N/A_____	

Regulation	RCRA GENERATOR INSPECTION CHECKLIST (PART 722)	Violation
(725.299) (265.199) TANKS	Are incompatible wastes/materials placed in the same tank? Yes_____ No_____ N/A_____ If "No", skip to Section 725.300. Is Section 725.117(b) being complied with? Yes_____ No_____ N/A_____ Has the tank system been properly decontaminated if it previously held an incompatible waste/material unless Section 725.117(b) is complied with? Yes_____ No_____ N/A_____ COMMENTS:	
(725.131) (265.31) I	**SUBPART C: PREPAREDNESS AND PREVENTION** Is the facility being operated and maintained to minimize the possibility of a fire, explosion or any release of hazardous waste or hazardous waste constituents which could threaten human health or the environment? Yes✓ No_____ N/A_____	
(725.132) (265.32) I	Is the facility equipped with the following, if necessary: a) an internal communication or alarm system(s)? Yes✓ No_____ N/A_____ b) a telephone or other device to summon emergency assistance from local authorities? Yes✓ No_____ N/A_____ c) portable fire extinguishers, fire control equipment, spill control equipment and decontamination equipment? Yes✓ No_____ N/A_____ d) water at adequate volume and pressure for fire control? Yes✓ No_____ N/A_____	
(725.133) (265.33) P	Is the facility testing and maintaining communication/alarm system(s), fire protection equipment, spill control equipment and decontamination equipment? Yes✓ No_____ N/A_____	
(725.134) (265.34) I Q	a) Where hazardous waste is being handled, do all employees have immediate access to an internal alarm or other emergency communication device? Yes✓ No_____ N/A_____ b) If there is ever just one employee on the premises when the facility is operating, does he/she have immediate access to a device capable of summoning external emergency assistance? Yes✓ No_____ N/A_____	
(725.135) (265.35) I	Is the facility maintaining adequate aisle space? Yes✓ No_____ N/A_____	
(725.137) (265.37) P	Has the facility attempted to make the following arrangements, as appropriate, for the type of facility and waste: – arrangements with local emergency authorities (i.e. police and fire departments, other emergency response agencies) to familiarize them with the layout of the facility, properties of hazardous waste handled, places where facility personnel would be working, entrances to roads inside the facility and evacuation routes? Yes✓ No_____ N/A_____ – agreements designating the primary authority where more than one police or fire department might respond? Yes✓ No_____ N/A_____ – agreements with State emergency response teams, contractors and equipment suppliers? Yes✓ No_____ N/A_____ – arrangements to familiarize local hospitals with the properties of hazardous waste handled at the facility and the type of injuries or illnesses which could result from fires, explosions or releases at the facility? Yes✓ No_____ N/A_____	

Regulation	RCRA GENERATOR INSPECTION CHECKLIST (PART 722)	Violation

SUBPART D: CONTINGENCY PLAN AND EMERGENCY PROCEDURES

(725.151a) P (265.51)

Is the contingency plan available? Yes ✓ No_____ N/A_____

If "No", skip to Section 725.155.

Is the plan designed to protect human health and the environment from releases to the air, soil and water? Yes ✓ No_____ N/A_____

(725.151b) Q + I (265.51)

Has there been a fire, explosion or release of hazardous waste? PbO_2 release Yes_____ No_____ N/A_____

If "Yes", has the contingency plan been carried out immediately? Yes ✓ No_____ N/A_____

(725.152a) P (265.52)

Does the plan describe the actions required for response to:

- fires? Tornados. Yes ✓ No_____ N/A_____
- explosions? Yes ✓ No_____ N/A_____
- releases? Yes ✓ No_____ N/A_____

(725.152c) P (265.52)

Does the plan describe arrangements with:

- police and fire departments? Yes ✓ No_____ N/A_____
- hospitals? Yes ✓ No_____ N/A_____
- contractors? Yes ✓ No_____ N/A_____
- emergency response teams? Yes ✓ No_____ N/A_____

(725.152d) (265.52)

Does the plan contain the current emergency coordinator's name, phone (office and home) and address? Yes ✓ No_____ N/A_____

(725.152e) (265.52)

Does the plan identify all emergency equipment including:

- description? Yes ✓ No_____ N/A_____
- capability? Yes ✓ No_____ N/A_____
- location? Yes ✓ No_____ N/A_____

Is the list of emergency equipment up-to-date? Yes ✓ No_____ N/A_____

(725.152f) (265.52)

Does the plan include:

- an evacuation plan? Yes ✓ No_____ N/A_____
- an evacuation signal? Yes ✓ No_____ N/A_____
- alternate evacuation routes? Yes ✓ No_____ N/A_____

Tornado shelters

(725.153) (265.53)

Has the contingency plan (including all revisions) been:

a) maintained at the facility? Yes ✓ No_____ N/A_____

b) submitted to:

- police department? Yes ✓ No_____ N/A_____
- fire department? Yes ✓ No_____ N/A_____
- hospital? Yes ✓ No_____ N/A_____
- emergency response teams? Yes ✓ No_____ N/A_____

(725.154) (265.54)

Has the contingency plan been reviewed and revised whenever:

a) regulations are revised? Yes_____ No_____ N/A_____

b) the plan fails in an emergency? Yes_____ No_____ N/A_____

c) the facility changes in a way that modifies the emergency response necessary? Yes_____ No_____ N/A_____

d) information regarding emergency coordinators changes? Yes_____ No_____ N/A_____

e) information regarding equipment changes? Yes_____ No_____ N/A_____

as needed

(725.155) Q (265.55) Q

Is the emergency coordinator on-site or on call at all times? Yes ✓ No_____ N/A_____

Is the emergency coordinator familiar with all facility activities, wastes, records, layout and contingency plan? Yes ✓ No_____ N/A_____

Does the emergency coordinator have the authority to commit the resources needed to carry out the actions specified in the contingency plan? Yes ✓ No_____ N/A_____

Regulation	RCRA GENERATOR INSPECTION CHECKLIST (PART 722)	Violation
(725.156) (265.56)	If the facility has had a release, fire or explosion, have the procedures of this Section been followed regarding assessment, response and reporting? Yes_____ No ✓ N/A_____ **Note:** If the facility has had a release, explain in detail.	
(725.116a) (265.16)	**Section 725.116 Personnel Training** Does the facility have a training program? Yes ✓ No_____ N/A_____ Have facility personnel successfully completed a program of classroom or on-the-job training that teaches them to perform their duties in a way that ensures the facility's compliance with the requirements of Part 725? Yes ✓ No_____ N/A_____ Is the program directed by a person trained in hazardous waste management procedures? Yes ✓ No_____ N/A_____ Does the program teach facility personnel hazardous waste management procedures (including contingency plan implementation) relevant to the positions in which they are employed? Yes ✓ No_____ N/A_____ Does the program cover, at a minimum: – procedures to familiarize facility personnel with emergency procedures, emergency equipment and emergency systems? Yes ✓ No_____ N/A_____ – procedures for using, inspecting, repairing and replacing facility emergency and monitoring equipment? Yes ✓ No_____ N/A_____ – key parameters for automatic waste feed cut-off systems? Yes_____ No_____ N/A ✓ – communications or alarm systems? Yes ✓ No_____ N/A_____ – response to fire or explosions? Yes ✓ No_____ N/A_____ – response to groundwater contamination incidents? Yes_____ No_____ N/A ✓ – shutdown of operations? Yes_____ No_____ N/A ✓	
(725.116b) (265.16)	Have new employees completed the program within 6 months of the date of employment or assignment to a position requiring them to manage hazardous waste? Yes ✓ No_____ N/A_____	
(725.116c) (265.16)	Have facility personnel received an annual review of the initial training? Yes ✓ No_____ N/A_____	
(725.116d) (265.16)	Are the following documents and records being maintained at the facility: 1) the job title for each position related to hazardous waste management and the name(s) of the employee(s) filling each job? Yes ✓ No_____ N/A_____ 2) a written job description for each position above, including the requisite skill, education or other qualifications and duties of personnel assigned to each position? Yes ✓ No_____ N/A_____ 3) a written description of the type and amount of both initial and continuing training that will be given to each person filling a position dealing with hazardous waste management? Yes ✓ No_____ N/A_____ 4) records documenting that the training or job experience has been given to and completed by facility personnel? Yes ✓ No_____ N/A_____	
(725.116e) (265.16)	Is the facility maintaining training records until closure of the facility and those of former employees for at least 3 years from the last date of employment? Yes ✓ No_____ N/A_____	

Regulation	RCRA GENERATOR INSPECTION CHECKLIST (PART 722)	Violation
(728.107a4) (265.13)	**Section 728.107 Waste Analysis and Recordkeeping** Has the generator who treats a prohibited waste in tanks or containers in order to meet the treatment standards developed and followed a waste analysis plan? Yes_____ No_____ N/A_____ Is the plan on-site? Yes_____ No_____ N/A_____ Does the plan include a detailed physical and chemical analysis? Yes_____ No_____ N/A_____ Has the plan been filed with the Agency at least 30 days prior to commencement of treatment activity? Yes_____ No_____ N/A_____ Has the generator submitted the required notification and certification that the waste meets treatment standards when the waste is shipped off-site? Yes_____ No_____ N/A_____	--
722.134(c) (262.34)	**Section 722.134 Satellite Accumulation** Is the generator who accumulates hazardous waste at or near any point of generation where wastes initially accumulate and which is under the control of the operator of the process generating the waste722.134(c) limiting such accumulation to 55 gallons of hazardous waste or 1 quart of acutely hazardous waste marking the containers with the words "Hazardous Waste" or other words identifying the contents? Yes_____ No_____ N/A_____ Has the generator who accumulates more than 55 gallons of hazardous waste or 1 quart of acutely hazardous waste complied with the requirements of Section 722.134(a) within 3 working days? Yes_____ No_____ N/A_____ If there are more than 55 gallons of hazardous waste or 1 quart of **acutely** hazardous waste in the satellite accumulation area, are the containers marked with the date accumulation began? Yes_____ No_____ N/A_____ During the 3 day period, is the generator continuing to comply with the requirements of Section 722.134(c)(1) with respect to the excess waste? Yes_____ No_____ N/A_____	722.134(c)
	SUBPART D: RECORDKEEPING AND REPORTING	
722.140(a) (262.40)	**Section 722.140 Recordkeeping** Has the generator retained for a period of 3 years: – a copy of each signed manifest? Yes_____ No_____ N/A_____	722.140(a)
722.140(b) (262.40)	Has the generator retained a copy of each Annual Report and Exception Report for a period of at least three years from the due date of the report (March 1)? Yes_____ No_____ N/A_____	722.140(b)
722.140(c) (262.40)	Has the generator retained for a period of 3 years: – copies of test results, waste analyses or other determinations made in accordance with Section 722.111? all > 3 years, on Computer Yes_____ No_____ N/A_____	722.140(c)
722.140(d) (262.40)	Does a generator who is involved in any unresolved enforcement action or as requested by the Director continue to maintain the records required in subsections a) and c)? Yes_____ No_____ N/A_____	722.140(d)
722.141(a) (262.41)	**Section 722.141 Annual Reporting** Has the generator who ships hazardous waste off-site for treatment, storage or disposal filed an annual report with the Agency by March 1 for the preceding calendar year? Yes_____ No_____ N/A_____ **Note:** If "No", or if deficiencies are noted with the annual report reviewed, contact the Planning and Reporting Section.	722.141(a)
722.141(b) (262.41)	Has the generator who treats, stores or disposes of hazardous waste on-site, filed an annual report with the Agency by March 1 for the preceding calendar year? Yes_____ No_____ N/A_____	722.141(b)

Regulation	RCRA GENERATOR INSPECTION CHECKLIST (PART 722)	Violation
P 722.142(a)(1) (262.42)	**Section 722.142 Exception Reporting** If the generator has not received a copy of the manifest from the TSD facility within 35 days of the date of delivery to the transporter, has the generator contacted the transporter or the TSD facility to determine the status of the hazardous waste? Yes_____ No_____ N/A✓	722.14
722.142(a)(2) (262.42)	If the generator has not received a copy of the signed manifest within 45 days of the date of delivery to the transporter, has he filed an exception report with the Agency in accordance with the requirements of this Section? Yes_____ No_____ N/A✓	722.142(a)(2)
722.143 (262.43)	**Section 722.143 Additional Reporting** Has the generator furnished additional reports as required by the Director? Yes✓ No_____ N/A_____	722.143
Q (262.50- 262.58)	**SUBPART E: EXPORTS OF HAZARDOUS WASTE** Is the generator an exporter of hazardous waste? Yes_____ No✓ N/A_____ If "Yes", has the generator complied with the requirements of Subpart E? Yes_____ No_____ N/A✓	
Q (262.60)	**SUBPART F: IMPORTS OF HAZARDOUS WASTE** Is the generator an importer of hazardous waste? Yes_____ No✓ N/A_____ If "Yes", has the generator complied with the requirements of Subpart F? Yes_____ No_____ N/A✓	
Q (262.70)	**SUBPART G: FARMERS** Is the generator a farmer? Yes_____ No_____ N/A✓ If "Yes", has the generator complied with the requirements of Subpart G? Yes_____ No_____ N/A✓	
	COMMENTS: Facility has not been inspected (RCRA) for several years. The paperwork was not accessed quickly by facility personnel. All necessary information was available, however, the inspector had to piece the information together more than what is usual.	

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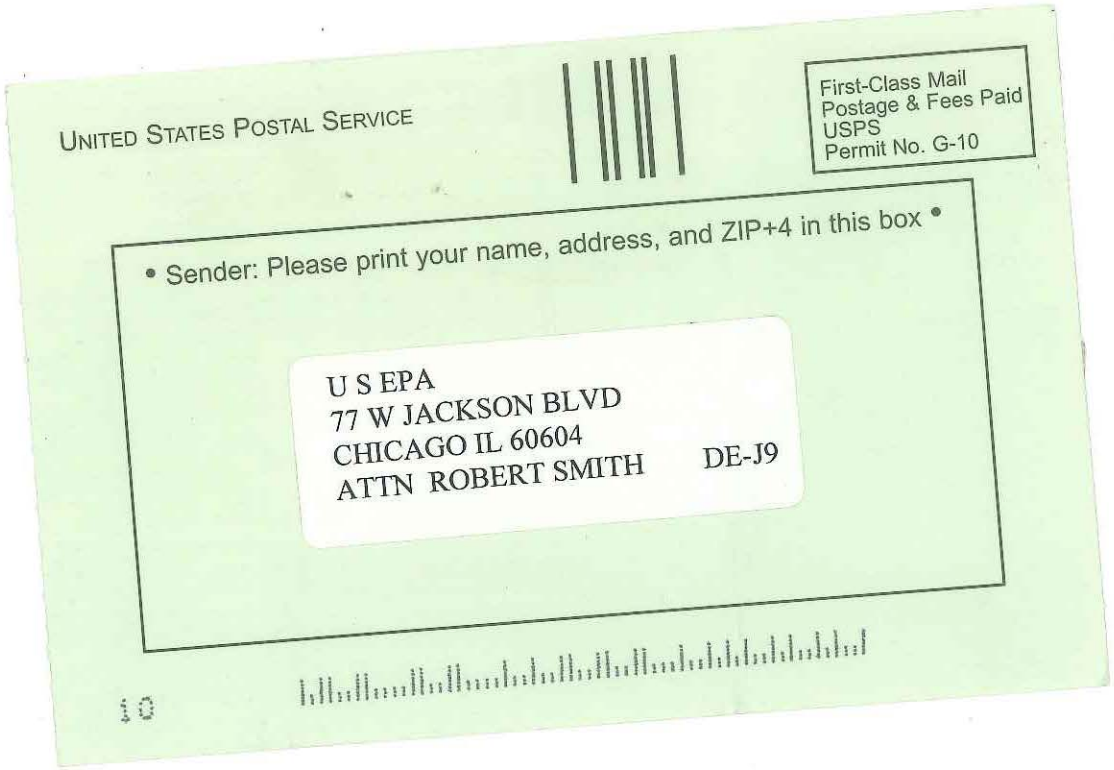
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• Sender: Please print your name, address, and ZIP+4 in this box •
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CHICAGO IL 60604
ATTN ROBERT SMITH DE-J9
10

SENDER: *COMPLETE THIS SECTION*

- Complete items 1, 2, and 3. Also complete item 4 if Restricted Delivery is desired.
- Print your name and address on the reverse so that we can return the card to you.
- Attach this card to the back of the mailpiece, or on the front if space permits.

1. Article Addressed to:

MR THOMAS SCHOE[illegible]ANAGER
PLANT ENGINEERING
JOHNSON CONTROLS BATTERY GROUP
300 SOUTH GLENGARRY DRIVE
GENEVA IL 60134

COMPLETE THIS SECTION ON DELIVERY

A. Received by *(Please Print Clearly)* | B. Date of Delivery

C. Signature

X Jose Budzynski ☐ Agent ☐ Addressee

[illegible] address different from item 1? ☐ Yes
[illegible]ter delivery address below: ☐ No

10-21-04

[illegible]ype

☒ Certified Mail ☐ Express Mail
☐ Registered ☒ Return Receipt for Merchandise
☐ Insured Mail ☐ C.O.D.

4. Restricted Delivery? *(Extra Fee)* ☐ Yes

2. Article Number *(Transfer from service label)* 7001 0320 0006 0293 2289

PS Form 3811, March 2001 Domestic Return Receipt 102595-01-M-1424

JUN 0 8 1998

DE-9J

Mr. Chuck Giesige
Plant Manager
Johnson Controls Battery Group, Inc.
300 South Glengarry Drive
Geneva, Illinois 60134

Re: RCRA Compliance Inspection
Johnson Controls Battery
EPA ID No.: ILD 980 502 470

Dear Mr. Giesige:

On February 3, 1998, your installation located in Geneva, Illinois was inspected by the United States Environmental Protection Agency (U.S. EPA) representatives Patrick Kuefler, Ivonne Vicente, and Bryan Holtrop. The purpose of the inspection was to evaluate compliance with certain requirements of the Resource Conservation and Recovery Act(RCRA); specifically, those regulations or permit conditions related to the generation and storage of hazardous waste. On March 30, 1998, a Notice of Violation (NOV) was issued against your facility for violations of the Illinois Administrative Code requirements, Sections 725.135, 725.273(a) and 722.116.

Based on information provided by your personnel, review of records, and the April 27, 1998, Answer to the NOV (April 27 Answer), it was determined that your installation is engaged in the management of hazardous waste. As of this writing, our review of that inspection and review of the April 27 Answer, U.S. EPA has determined that you are in compliance with the specific RCRA requirements under examination.

This determination does not limit the applicability of either the requirements examined or other RCRA regulations. Your installation will continue to be evaluated by U.S. EPA and the Illinois Environmental Protection Agency in the future.

If you have any questions and/or concerns regarding this matter, please contact Patrick Kuefler of my staff at (312) 353-6268.

Sincerely yours,

Lorna M.Jereza, P.E., Chief
Illinois/Indiana Section
Enforcement and Compliance Assurance Branch

cc: Todd Marvel - IEPA

bcc: Section Copy
Branch Copy

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bcc: Section Copy
Branch Copy

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ENFORCEMENT AND COMPLIANCE ASSURANCE BRANCH

SECRETARY	SECRETARY	SECRETARY	SECRETARY	SECRETARY	SECRETARY
5/28/98					
AUTHOR/ TYPIST 6/1/98	MINN/OHIO SECTION CHIEF	MICHIGAN/ WISCONSIN SECTION CHIEF	ILLINOIS/ INDIANA SECTION CHIEF	ECAB BRANCH CHIEF	WPTD DIVISION DIRECTOR
			6/9/98		

Johnson Controls, Inc.
Battery Group
300 South Glengarry Drive
Post Office Box 270
Geneva, IL 60134
Tel. 630/232 4270

JOHNSON CONTROLS

Mr. Patrick Kuefler DRE-9J
EPA Region V
77 W. Jackson Blvd.
Chicago, IL 60604-3590

April 27, 1998

Dear Mr. Kuefler:

Re: Notice of Violation -- ILD 980 502 470

This letter is in response to U.S. EPA's February 3, 1998 inspection and corresponding March 30 follow up report for Johnson Controls Battery Group, Inc. (JCBGI) - Geneva plant.

In the follow up report two of the digits of our identification number were transposed; 052 instead of 502. We have indicated the proper identification number in our response.

The following three items were identified during the inspection to be deficient:

1. I.A.C. Section 725.135 Aisle space must be maintained to allow the unobstructed movement of personnel, and equipment to any area of the facility operation. At the time of the inspection, 55-gallon containers holding hazardous waste located in the scrap room were stored in a manner obstructing inspection and spill response access to several containers.

Response: The plant has designated aisle spaces painted on the floor of the 90 day storage area (see attached top picture). The painted lines indicate where to place the pallets to maintain proper aisle space. The drum labels are visible from the aisles.

2. I.A.C. Section 725.273(a) Containers holding hazardous waste located at or near the point of generation (satellite accumulation) must be kept closed except when adding or removing waste from the container. During the inspection, a satellite accumulation container holding hazards waste located at

the entrance of the scrap room was observed open while waste was neither being added or removed.

Response: Previously this satellite accumulation site used a smaller container with a removable lid. During the inspection, the lid was not properly in place. To prevent this, the smaller container was replaced with a 55-gallon drum. This allows the use of a similar hinged cover which are used throughout the plant (see attached bottom photo). This issue of lids on containers will also be emphasized during the next hazardous waste training.

3 I.A.C. Section 725.116 (d)(2) JCBGI must provide a written job description for all hazardous waste personnel. JCBGI failed to provided a written job description for all hazardous waste personnel. The written job description for Victor Fernandez was not provided during the inspection.

As we discussed previously, JCBGI does not have an employee Victor Fernandez. Job descriptions for all hazardous waste personnel are attached. The job descriptions are used to determine who should get trained and the training content.

If you have any questions, please call me at (630)232-4270.

Sincerely,

JOHNSON CONTROLS BATTERY GROUP, INC.

Chuck Giesige

Chuck Giesige
Plant Manager


LEAD CONTAMINATED
WASTE ONLY
NO AEROSOL CANS

Geneva Job Titles and Descriptions

Manager of Engineering:
Emergency coordinator for hazardous waste activities. Assists in training of plant personnel in hazardous waste handling. Notifies proper authorities in emergency situations. Consults with process engineer on hazardous waste control system problems. Reports to Plant Manager.

Process Engineer:
Emergency coordinator for hazardous waste activities. Training of plant personnel in hazardous waste handling. Responsible for air water, and solid waste control systems on site. Notifies proper authorities in emergency situations. Schedules maintenance and repairs to pollution control equipment. Maintains logs, monitoring and inspection records for pollution control systems. Drafts and submits reports required by Federal, State, County or Municipal Agency. Reports to Manager of Engineering.

Industrial Hygiene and Safety Coordinator:
Training operators in proper methods of material handling with regard to safety and hygiene. Trains operators in handling emergency situations. Regularly inspects facilities and equipment status with regard to safety and hygiene testing when needed. Reports to Human Resource Manager.

Plant Nurse:
Renders professional nursing care to all employees through programs of disease prevention and health maintenance. Administers first aid and emergency treatment. Administers biological monitoring program, maintains records. Conducts individual and group counseling for occupational or non-occupational health concerns. Organizes and supervises plant first aid program. Prepares and maintains all medical records. Reports to Human Resource Manager.

Production Supervisor:
Emergency Coordinator for hazardous waste activities on assigned shift and area. Oversees hazardous waste operations on their individual shift. Assists in training of new operators. Responsible for air, water, and waste control systems in operation during shift. Notifies proper authorities in emergency situations. Reports to General Production Supervisor/Plant Superintendent.

Scrap Coordinator:
Inspects drums and other storage equipment for proper operation and integrity. Inspects container storage area for leaks, spills and inappropriately placed containers. Weighs and check contents of each container of hazardous waste and byproduct material. Assures proper packaging and labeling. Maintains current inventory of hazardous waste and byproduct material stored in the area and directs material to proper storage area. Operates hazardous waste handling equipment. Loads trucks with hazardous waste and byproduct material. Records weight and quantity of containers loaded and reports that information to Plant Engineer. Notifies supervisor or other plant authorities in emergency situations. Takes emergency action on own authority in accordance with established procedures. Reports to W.O. 11, 13, & 17 production department supervisor.

Warehouser:
Maintains and operates material handling equipment. Identifies contents of hazardous waste containers and assures proper packaging and labeling of hazardous waste. Transports hazardous waste from satellite accumulation areas to 90 day storage area. May assist during emergency situations. Reports to production department supervisor.

Uptime Operator:
Relieves production incentive operators during regular operators staggered lunches and breaks. During balance of shift, performs non-incentive duties. Assures hazardous waste is properly packaged and labeled. May transport hazardous waste from satellite accumulation areas to 90 day storage area. Reports to production supervisor.

Maintenance Mechanic:
Keeps machinery, equipment, and plant structure in operating condition. Repairs equipment and waste control systems as necessary. Assures proper segregation of hazardous and nonhazardous wastes during maintenance activities. Assists as necessary in emergency situations. Reports to maintenance supervisor.

Wastewater Treatment Operator:
Operates and monitors process and equipment to treat wastewater prior to discharge to local POTW. Removal of lead, acid, and other contaminants. Assures all related equipment is operating properly. Assures proper packaging and labeling of waste and byproduct material during daily activities. Reports to maintenance supervisor.

Janitor:
Cleans, vacuums, sweeps, factory areas. Empties rubbish containers. Assures waste and byproduct material is properly segregated. Reports to maintenance supervisor.

Illinois Environmental Protection Agency 2200 Churchill Road, Springfield, IL 62706

217/782-6761

Refer to: C89C350005 -- Kane County
Johnson Controls, Inc. - Globe Battery Division
ILD980502470
Compliance File

PRE-ENFORCEMENT CONFERENCE LETTER

Certified # P486650844

April 25, 1988

Johnson Controls, Inc. - Globe Battery Division
Attn: Brad Fearnley
300 S. Glengarry Drive
Geneva, Illinois 60134

Dear Mr. Fearnley:

By copy of this letter the Agency hereby informs Johnson Controls, Inc. of apparent violations of the Illinois Environmental Protection Act and/or rules and regulations adopted thereunder. These apparent violations are set forth in Attachment A of this letter.

As a result of these apparent violations, it is our intent to refer this matter to the Agency's legal staff for the preparation of a formal enforcement case. The Agency's legal staff will, in turn, refer this matter to the Office of Attorney General or to the United States Environmental Protection Agency for the filing of a formal complaint.

Prior to taking such action, however, you are requested to attend a Pre-Enforcement Conference to be held at the Illinois Environmental Protection Agency, 1701 S. First Avenue, Suite 600, Maywood, Illinois. The purpose of this Conference will be:

1. To discuss the validity of the apparent violations noted by Agency staff, and

2. To arrive at a program to eliminate existing and/or future violations.

You should, therefore, bring such personnel and records to the conference as will enable a complete discussion of the above items. We have scheduled the Conference for Thursday, May 12, 1988, at 1:00 pm. If this arrangement is inconvenient, please contact Phyllis Reed at 312/345-9780 to arrange for an alternative date and time.

In addition, please be advised that this letter constitutes the notice required by Section 31(d) of the Illinois Environmental Protection Act prior to the filing of a formal complaint. The cited Section of the Illinois Environmental Protection Act requires the Agency to inform you of the charges which are to be alleged and offer you the opportunity to meet with appropriate officials within thirty days of this notice date in an effort to resolve such conflict which could lead to the filing of formal action.

Sincerely,

Harry A. Chappel, P.E., Manager
Compliance Section
Division of Land Pollution Control

HAC:PR:BW:mab/1154j/17-18

Attachment

cc: Division File
Maywood Region
Phyllis Reed
Brian White

1. Pursuant to 35 Ill. Adm. Code 722.134(a), except as provided in Subsections (d), (e) or (f), a generator may accumulate hazardous waste on-site for 90 days or less without a permit or without having interim status provided that:

   1. The waste is placed in containers and the generator complies with 35 Ill. Adm. Code 725 Subpart I (Use and Management of Containers) or the waste is placed in tanks and the generator complies with 35 Ill. Adm. Code 725 Subpart J (Tanks) except 35 Ill. Adm. Code 725.293;

   2. The date upon which each period of accumulation begins is clearly marked and visible for inspection on each container;

   3. While being accumulated on-site, each container and tank is labeled or marked clearly with the words,"Hazardous Waste", and

   4. The generator complies with the requirements for owners or operators in 35 Ill. Adm. Code 725 Subparts C (Preparedness and Prevention) and D (Contingency Plan and Emergency Procedures) and with 35 Ill. Adm. Code 725.116 (Personnel Training).

   You are in apparent violation of 35 Ill. Adm. Code 722.134(a) in that item(s) 3 and 4 above was/were not complied with.

   Specifically, the requirements of item 1 and/or 4 above (listed by regulation) which were not complied with, as well as the deficiencies observed, are:

      A. The hazardous waste accumulation tank was not labeled or marked with the words "Hazardous Waste".

      B. Pursuant to 35 Ill. Adm. Code 725.116(d), the owner or operator must maintain the following documents and records at the facility:

         1. The job title for each position at the facility related to hazardous waste management and the name of the employee filling each job;

         2. A written job description for each position listed under paragraph (d)(1) of this Section. This description may be consistent in its degree of specificity with descriptions for other similar positions in the same company location or bargaining unit, but must include the requisite skill, education or other qualifications and duties of facility personnel assigned to each position;

         3. A written description of the type and amount of both introductory and continuing training that will be given to each person filling a position listed under paragraph (d)(1) of this Section;

4. Records that document that the training or job experience required under paragraphs (a), (b) and (c) of this Section has been given to and completed by facility personnel.

You are in apparent violation of 35 Ill. Adm. Code 725.116(d) in that item(s) 1 and 2 above were not maintained at the facility.

C. Pursuant to 35 Ill. Adm. Code 725.135, the owner or operator must maintain aisle space to allow the unobstructed movement of personnel, fire protection equipment, spill control equipment and decontamination equipment to any area of facility operation in an emergency. You are in apparent violation of this Section because adequate aisle space was not maintained on the date of the inspection.

The hazardous waste container accumulation area did not have adequate aisle space. Also, the containers of hazardous waste should not be stacked more than two containers high.

2. Pursuant to 35 Ill. Adm. Code 722.134(c):

1. A generator may accumulate as much as 55 gallons of hazardous waste or one quart of acutely hazardous waste listed in 35 Ill. Adm. Code 721.133(e) in containers at or near any point of generation where wastes initially accumulate, which is under the control of the operator of the process generating the waste, without a permit or interim status and without complying with paragraph (a) provided the generator:

A. Complies with 35 Ill. Adm. Code 725.271, 725.272 and 725.273(a) (Use and Management of Containers); and

B. marks the generator's containers either with the words "Hazardous Waste" or with other words that identify the contents of the containers.

2. A generator who accumulates either hazardous waste or acutely hazardous waste listed in 35 Ill. Adm. Code 721.133(e) in excess of the amounts listed in Subsection (c)(1) at or near any point of generation must, with respect to that amount of excess waste, comply within three days with Subsection (a) or other applicable provisions of this chapter. During the three day period the generator must continue to comply with Subsection (c)(1). The generator must mark the container holding the excess accumulation of hazardous waste with the date the excess amount began accumulating.

You are in apparent violation of 35 Ill. Adm. Code 722.134(c) for the following reason(s): The container near the "stacker" area (satellite accumulation area) was not marked with the words "Hazardous Waste" or with words to identify the contents of the container.

3. 35 Ill. Adm. Code 722.140(b) requires the generator to keep a copy of each Annual Report and any Exception Report(s) for a period of at least three years from the due date. You are in apparent violation of this Section in that the 1987 generator annual report was not available during the inspection.

BW:mab/1154j/18-21

P366 562 299

MAR 30 1998

DE-9J

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Mr. Tom Schoen
Engineering Manager
Johnson Controls, Inc.
300 South Glengarry Drive
P.O. Box 270
Geneva, Illinois 60134

Re: Notice of Violation
Johnson Control Battery Group, Inc.
ILD 980 052 470

Dear Mr. Schoen:

On February 3, 1998, your installation located in Geneva, Illinois was inspected by United States Environmental Protection Agency (U.S. EPA) representatives. The purpose of the inspection was to evaluate compliance with certain requirements of the Resource Conservation and Recovery Act (RCRA); specifically, those regulations or permit conditions related to the generation of hazardous waste. A copy of the inspection report is enclosed for your reference.

Based on information provided by your personnel, review of records, and physical observations by the inspector(s) at the time of the investigation, it was determined that your installation is engaged in the management of hazardous waste. It was also determined that Johnson Control Battery Group, Inc. (JCBG) has violated the following requirement(s):

1. **I.A.C. Section 725.135** Aisle space must be maintained to allow the unobstructed movement of personnel, and equipment to any area of the facility operation. At the time of the inspection, 55-gallon containers holding hazardous waste located in the scrap room were stored in a manner obstructing inspection and spill response access to several containers.

2. **I.A.C. Section 725.273(a)** Containers holding hazardous waste located at or near the point of generation (satellite accumulation) must be kept closed except when adding or removing waste from the container. During the inspection, a satellite accumulation container holding hazardous waste located at the entrance of the scrap room was observed open while waste was neither being added or removed.

3. **I.A.C. 725.116 (d)(2)** JCBG must provide a written job description for all hazardous waste personnel. SJCBG failed to provide a written job description for all hazardous waste personnel. The written job description for Victor Fernandez was not provided during the inspection.

Pursuant to Section 3008(a) of RCRA, U.S. EPA may issue an order assessing a civil penalty for any past or current violation requiring compliance immediately or within a specified time period. Although this letter is not such an order, you are hereby requested to submit a response in writing to this office no later than thirty (30) days after receipt of this letter documenting the actions, if any, which have been taken since the inspection to establish compliance with the above requirements.

If you have any questions and/or concerns regarding this matter, please contact Patrick F. Kuefler, of my staff, at (312)353-6268.

Sincerely yours,

Lorna Jereza, P.E., Chief
Illinois/Indiana Section
Enforcement and Compliance Assurance Branch

Enclosure

cc: Todd Marvel, IEPA

bcc: Section Copy
Branch Copy

DE-9J/PK:be/3/30/98/filename:jcb.nov

ENFORCEMENT AND COMPLIANCE ASSURANCE BRANCH

SECRETARY	SECRETARY	SECRETARY	SECRETARY	SECRETARY	SECRETARY
BE 3/30/98					
AUTHOR/ TYPIST 3/30/98	MINN/OHIO SECTION CHIEF	MICHIGAN/ WISCONSIN SECTION CHIEF	ILLINOIS/ INDIANA SECTION CHIEF	ECAB BRANCH CHIEF	WPTD DIVISION DIRECTOR

STATE OF ILLINOIS
ENVIRONMENTAL PROTECTION AGENCY
INSPECTION REPORT

USEPA Number: ILD980502470 IEPA Number: 089035 0005

Facility Name: Johnson Controls Inc. — Battery Division

Street: 300 S. Glenarry Drive
City: Geneva Telephone: 312/232-4270
County: Kane State: IL Zip Code: 60134

Type of Facility: Notified As: G/S Regulated As: G
LDF? yes __ no ✓ HPV? yes __ no ✓ 90 Day Follow-up Required? yes __ no ✓

Region: II Date of Inspection: March 11, 1988 ~~March 30, 1988~~ From: 9:00 Am ~~10:00 Am~~ to 2:30 pm ~~12:00 pm~~
Weather (LDF Only): _____

Type of Inspection
ISS: ✓ Sampling: __ Citizen Complaint: __ Closed: __ Withdrawal: __
Record Review: __ Follow-up to Inspection of _____: __ Other: __

Non Regulated Status
Small Quant. Gen:: __ Claimed Nonhandler: __ Other(Specify in narrative): __

~~Notified As/Regulated As Matrix Number: 39 Key Letter: E~~

Notification date, 9/4/80, from initial ✓ or subsequent __ notification.

Part A date, 2/7/84, from initial __ or amended ✓. Part A withdrawan: _____

Part B permit application submitted? yes __ no ✓

Has the firm been referred to: USEPA? yes __ no ✓; IAG? yes __ no ✓; County States Attorney? yes __ no ✓. Date of referral to USEPA: _____, IAG: _____, County States Attorney: _____. USEPA ref to DOJ? yes — no ✓

Federal Court Order Issued: _____ State Court Order Issued: _____

USEPA CACO Issued: _____ CAFO Issued: _____ ALJ Decision Issued: _____

Illinois PCB Order Issued: _____

TSD Facility Activity Summary

Activity(by Process Code)	On Pt A	Activity Conducted Prior to 1980	Was Activity Ever Done	Closed	Being Done at Time of Inspection	Exempt from Regulation per 35 IAC, Section:	On Annual Report For: 87	86	85
S01	Yes	No	No	No	No	No	*	*	*
		container storage							
S02	Yes	No	No	No	No	No	*	*	*
		tank storage							

1, * Company did not file a 1987 generator annual report and filed only the 1986, 1985, 1984 generator (not facility) annual reports. manifests for 1987 through 1988 indicated that company was a generator only of hazardous waste.

Operator: Johnson Controls Inc. Telephone #: 312/232-4270

Street: 300 S. Glenaarry

City: Geneva State: IL Zip Code: 60134

Owner: Johnson Control Telephone #: 414/228-1200

Street: 5757 N. Greenbay Avenue

City: Glendale State: WI Zip Code: 53209

Person Interviewed	Title	Telephone #
Brad Fearnley	Manager of Engineering	312/232-4270
Robert Jennings	Process Engineer	312/232-4270

Inspection Participants	Agency/Title	Telephone #

Prepared By	Agency/Title	Telephone #
Phyllis Reed	IEPA/EPS I	312/345-9780

Summary of Apparent Violations

Area	Class	Section
OTH	I	722.134
OTH	II	722.140

Area	Class	Section

Area	Class	Section

Facility Name: Johnson Controls Inc. - Battery Divi   USEPA #: ILD980502470   IEPA #: 089 035 0005

Waste Name (Include haz & non-haz special & waste for which no determination has been made)	Generating Process (For waste gen. on site. N/A for TSD)	Date of Last Analysis	USEPA Haz Waste #	On 8700-12 *	On 3510-3 *	On Annual Rpt. for 87 *	86 *	85 *	Amount on Site	Rate of Generation	Last Manifested Shipment	Disposition
Hazardous Waste (EP Tox) solid, NOS, (Lead)	generated from process and cleaning	2/28/86	D008	Yes	Yes	No	Yes	Yes	approx. 100 drums	8200 yd/mo	3/10/88	Sanders lead Co. in Troy, AL for smelting or landfilling
Waste Flammable Liquid, NOS (oil & solvent)	new material never used	1/28/86	D001	Yes	Yes	No	No	No	None	one time incident	5/14/87	LWD in Calvert City KY for incineration
Hazardous Waste Liquid, Ferric Oxide white sludge	pretreatment waste water system	per load basis	D008	Yes	Yes	No	Yes	Yes	Less than 5000 gallons	2700 gal/mo.	10/31/86	Envirite Corp. in Harvey, IL for treatment
Waste Naptha Solvent	parts cleaning (degreasing)	Knowledge	D001	No	No	No	No	No	approx. 15-20 gallons	20 gal per every 3 months	**	Sanders lead Co. in Troy, AL for smelting

* Company has not filed a 1987 generator annual report.

** Company has been combining the waste naptha with the hazardous waste lead solid, because of the lead content in waste solvent.

* All "No" responses must be explained in the narrat e.

NARRATIVE

Johnson Controls, Inc. manufactures lead-acid automotive batteries for retail sale. Per Brad Fearnley, Manager of Engineering, Globe Union, Inc. was sold to Johnson Controls in 1978.

Johnson Controls recycles materials on-site and accepts back any bad batteries to be reprocessed.

This company has a pretreatment wastewater system where the wastewater is analyzed and then discharged to the Geneva Sanitary System.

Hazardous Waste

1. Hazardous Waste (EP Tox) Solid, NOS (lead) - D008
   - generated from the process and from clean-up
   - rate of generation is 8200 gallon/month
   - last shipment was 3/10/88 to Sanders Lead Company in Troy, AL for lead smelting or landfilling
   - amount on-site is approximately 100 drums located at the container accumulation area

2. Waste Flammable Liquid, NOS (oil & solvent) - D001
   - a one-time incident where Johnson Controls was sent this raw material to be used in their process. The company never did use this material and it was discovered during a general house cleaning.
   - only shipment was on 5/14/87 to LWD in Calvert City, KY for incineration
   - none on-site

3. Hazardous Waste Liquid, Ferric Oxide Waste sludge - D008
   - generated from the pretreatment wastewater system
   - rate of generation is 2700 gallon/month
   - last shipment was 10/31/86 to Envirite Corporation in Harvey, IL for treatment
   - amount on-site is less than 5000 gallons

4. Waste Naphtha Solvent - D001
   - generated from parts cleaning
   - rate of generation is 20 gallons/3 months
   - combined with the hazardous waste lead solid and manifested to Sanders Lead Company in Troy, AL for smelting
   - company claims that the waste solvent contains mostly lead

Additional Information...

1. Company filed an amended Part A in 1984 as a generator/storage facility.

2. During the inspection, the 1984-1988 manifests were reviewed and it appears as if the company is currently acting as a generator, only, of hazardous waste. Prior to 1984, the company appeared to be exempt under 721.106, the recycling exception.

Agency's records indicate Johnson Controls had notified the USEPA in 1984 as a generator/storage facility of hazardous waste. This company will continue to be regulated as a storage facility of hazardous waste until...

a. Johnson Controls withdraws the Part A, i.e., provides documentation and certifies that regulated hazardous waste was never "stored" on-site longer than 90 days

3. Forms to withdraw the Part A were supplied to the company during the inspection.

LIST OF VIOLATIONS

722.134 - The container near the "stacker" area (satellite accumulation area) was not marked with the words "Hazardous Waste" or with words to identify the contents in the container. This was resolved during the inspection.

- The hazardous waste accumulation tank was not marked or labelled with the words "Hazardous Waste". This was resolved during the inspection.

- (725.116) - Personnel training records did not include the following:

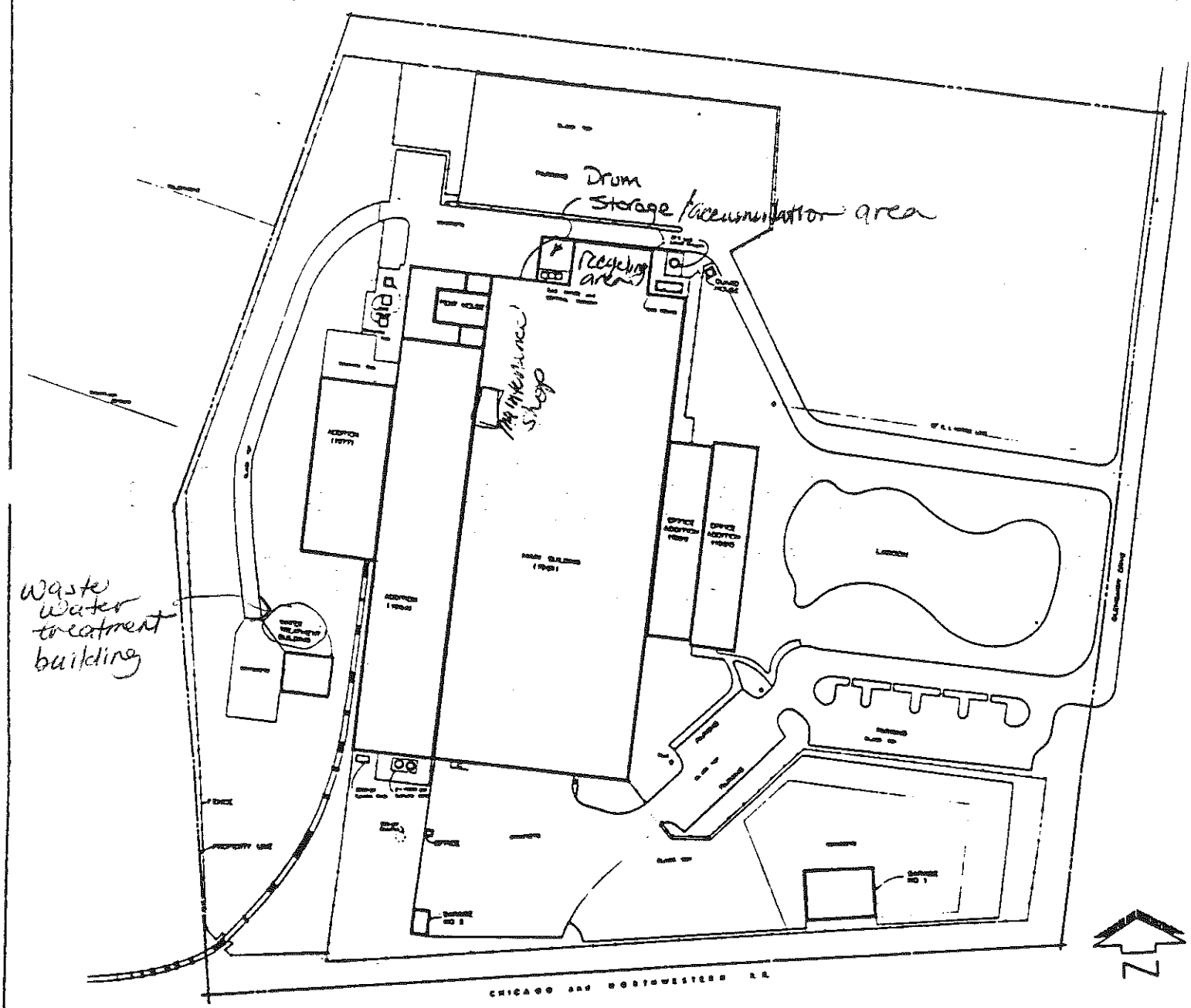
  a. job title for each position at the facility related to hazardous waste management and the name of the employee filling each job.

  b. a written job description for each position related to hazardous waste management

- (725.135) - Insufficient aisle space for the hazardous waste container accumulation area. Also, containers of hazardous waste should not be stacked any more than 2 containers high.

722.140 - The 1987 generator annual report was not available during the inspection.

PR:bh:2118B



JOHNSON CONTROLS - GENEVA IL

EPA ID. 980 502 470

RECEIVED

FEB 24 1984

E.P.A. — D.L.P.C.
STATE OF ILLINOIS

Photo #1

Date: March 11, 1988

Time: 9:00AM-2:30PM

Photograph By: PAR
Phyllis A. Reed

County: Kane

IEPA #: 0890350005

Site Name:
Johnson Controls

Comments: Satellite Accumulation located at the wet scrubber.

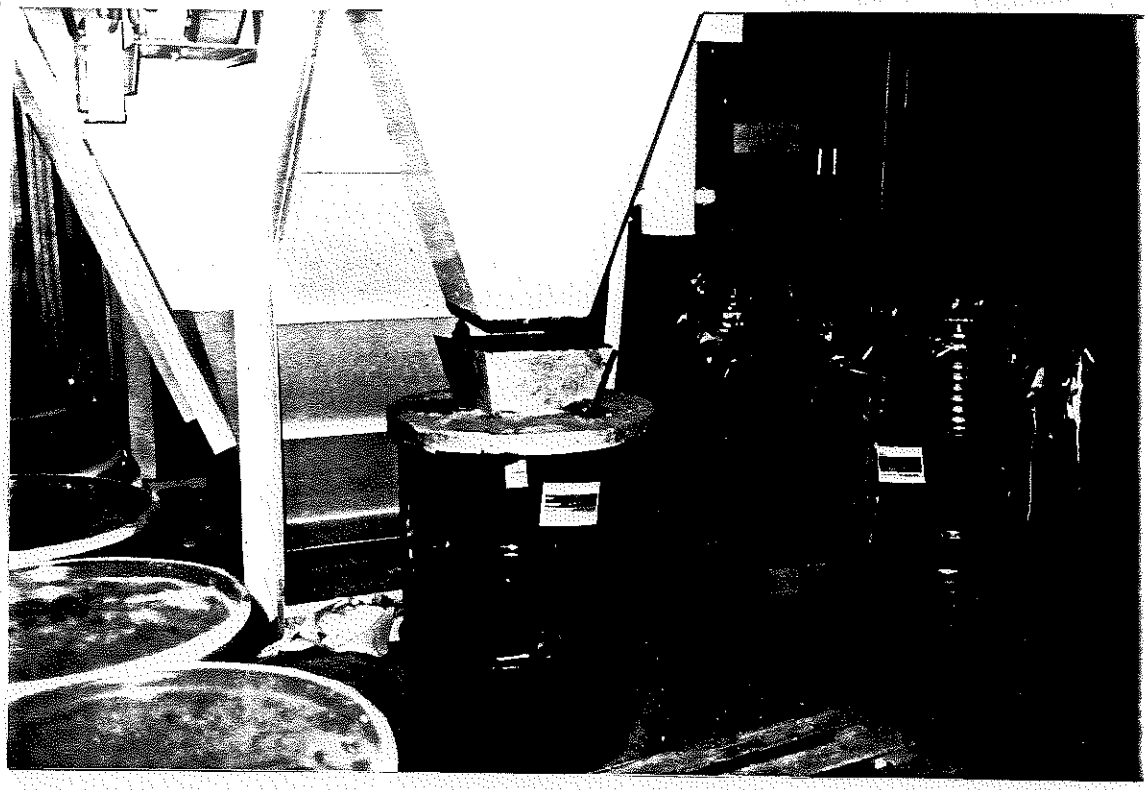


Photo #2

Date: March 11, 1988

Time: 9:00AM-2:30PM

Photograph By: PAR
Phyllis A. Reed

County: Kane

IEPA #: 0890350005

Site Name:
Johnson Controls

Comments: Accumulation tk for ferric oxide sludge located in the wastewater treatment building. No "hazardous waste" markings on the tank.

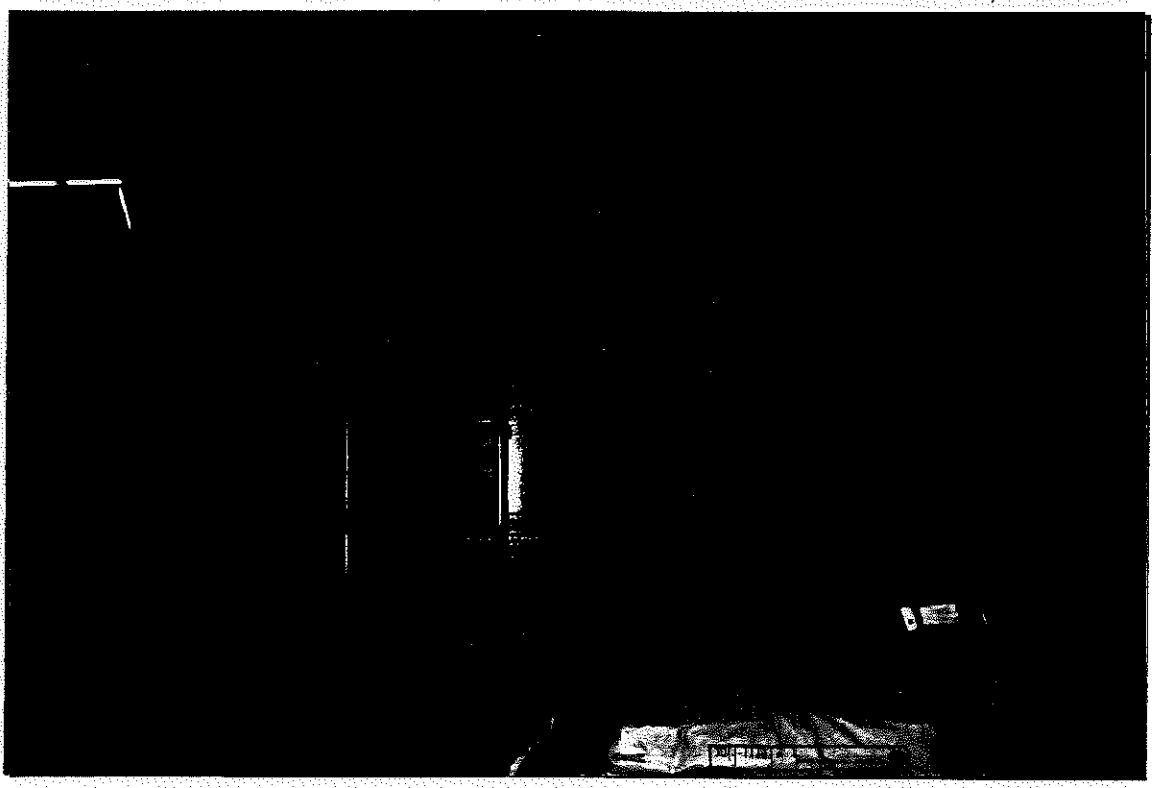


Photo #3

Date: March 11, 1988

Time: 9:30AM-2:30PM

Photograph By: PAR
Phyllis A. Reed

County: Kane

IEPA #: 0890350005

Site Name:
Johnson Controls

Comments: Degreaser unit located in the plant, inside the maintenance shop area.

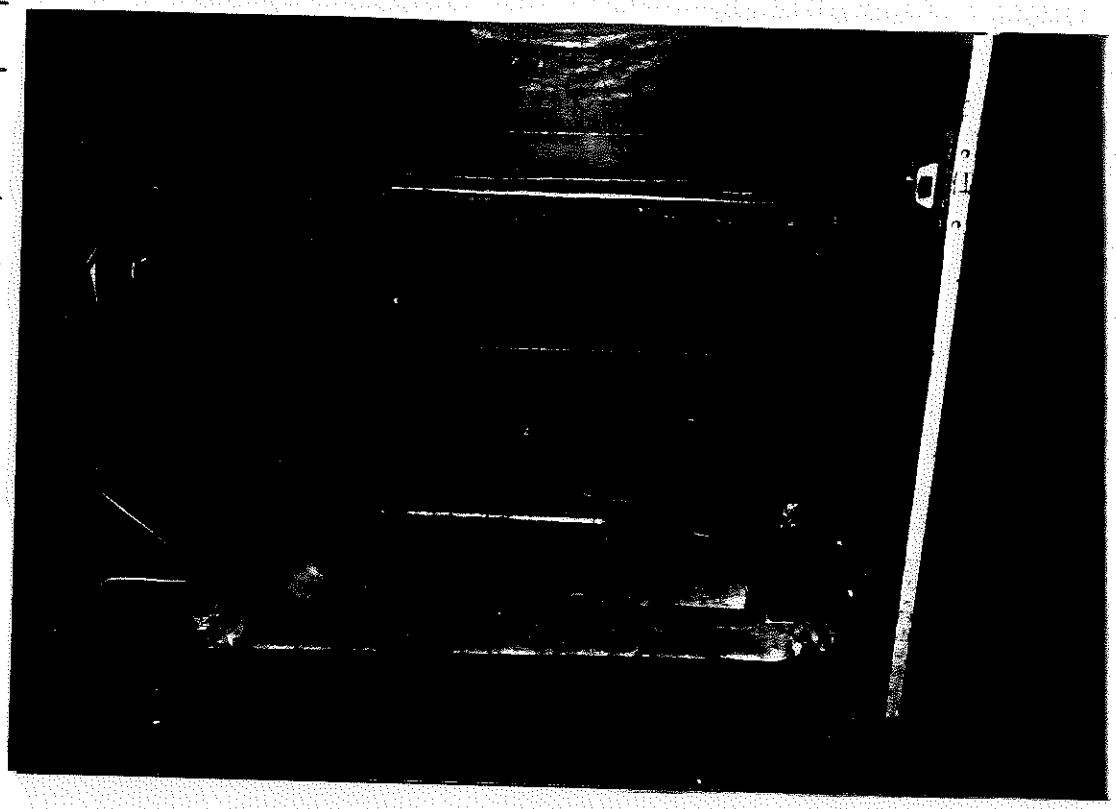


Photo #4

Date: March 11, 1988

Time: 9:30AM-2:30PM

Photograph By: PAR
Phyllis A. Reed

County: Kane

IEPA #: 0890350005

Site Name:
Johnson Controls

Comments: This is the company's drum storage/accumulation area. Per the company, waste is only accumulated on-site for 90 days or less.

Photo #5

Date: March 30, 1988

Time: 10:00AM-12:00N

Photograph By: PAR
Phyllis A. Reed

County: Kane

IEPA #: 0890350005

Site Name:
Johnson Controls

Comments: Drum storage/ accumulation area is located outside. Insufficient aisle was observed.

Photo #6

Date: March 30, 1988

Time: 10:00AM-12:00N

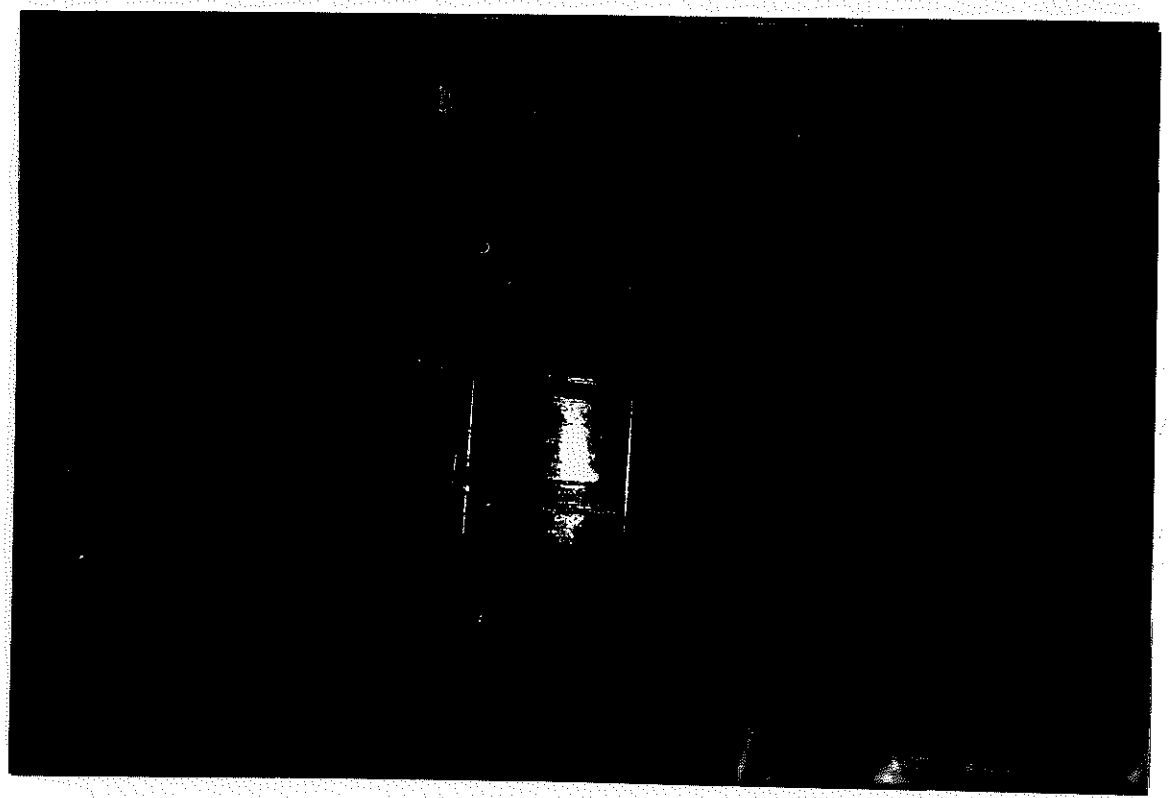
Photograph By: PAR
Phyllis A. Reed

County: Kane

IEPA #: 0890350005

Site Name:
Johnson Controls

Comments: Waste sludge tank has the words "hazardous waste" on it.



Johnson Controls, Inc.
Battery Group
5757 N. Green Bay Avenue
Post Office Box 591
Milwaukee, WI 53201-0591
Tel. 414/228 1200

JOHNSON CONTROLS

Mr. Patrick Kuefler DRE-9J
EPA Region V
77 W. Jackson Blvd.
Chicago, IL 60604-3590

March 10, 1998

Dear Mr. Kuefler:

Re: Follow up to the Geneva Inspection - By-product Exemption for Lead

This letter follows up our conversation about the Johnson Controls Battery Group, Inc. (JCBGI) Geneva battery plant hazardous waste inspection and is intended to document the regulatory analysis applicable to the lead-containing by-products of production.

Chapter 261 of 40 CFR provides exemptions from the RCRA hazardous waste management program. Section 40 CFR 261.1 explicitly provides that by-products exhibiting a characteristic of hazardous wastes are not considered solid wastes when they are reclaimed. JCBGI's lead management practices fall squarely within this exemption, 40 CFR 261.2(c)(3).

THE JCBGI MATERIALS ARE BY-PRODUCTS, NOT WASTES

The term by-product is defined by 40 CFR 261.1 as follows:

> "By-product" means a material that is not one of the primary products of a production process and is not

solely or separately produced by the production process.

The concept of a "by-product" is fundamentally opposed to the concept of a "waste". A "waste" is a discarded material (See 261.2(a)(1)). JCBGI does not discard the lead which it sends off-site for reclamation. JCBGI retains ownership of the lead at all times, precisely because it has substantial commercial value. If JCBGI were not able to reclaim the lead in this fashion it would have to purchase equivalent amounts of this raw material on the open market at considerable expense.

State or federal authorities have jurisdiction under RCRA or equivalent state programs only if a material is a "waste". JCBGI's by-product lead is not a waste. It is never discarded. The lead is segregated and recovered. Because the lead never becomes a "waste" the material is not subject to regulation under the general hazardous waste management program requirements. It is a by-product of the production process and therefore is entitled to the exemption of 40 CR 261.2(c)(3).

Johnson Controls' lead-containing materials include a variety of materials, all of which are a direct result of the battery production process. These materials include drosses, paste, lead oxide, acid dump and fill solids and other lead residues, plates, grids, terminals and posts, bushings, baghouse dust and filter press sludges. These materials generally fall into three categories: materials which are excess generated during production (e.g., drosses, pastes, oxide and other residues); materials which are somehow damaged or rendered unusable during production: (e.g., plates, grids, terminals, posts, and bushings)[1] and lead-containing materials segregated through a water-driven reclamation process (e.g., filter press sludges) or RADCO recovery (baghouse dust).

Each of these materials is generated during and as a direct result of the production process, but is not solely or separately produced by the production process. That is, they are not intended "products". (The batteries themselves are the only products created.) However, each of these materials is nearly entirely (if not exclusively) made up of lead. Each, therefore, has significant value. None of these materials are "discarded".

All of these materials are collected and transported to the Doe Run resource recovery facility as non-hazardous material exempt under 40 CFR 261.2.

THE JCBGI/DOE RUN OPERATIONS CONSTITUTE RECLAMATION

By-products exhibiting a characteristic are not considered solid waste if they are "reclaimed." Section 40 CFR 261.1 defines the term "reclaimed" as follows:

---

[1] Many of these materials are also exempt from regulation as "scrap metal" under 40 CFR 261.6.

A material is reclaimed if it is processed to recover a usable product, or if it is regenerated.

The primary function of the Doe Run recovery operation is to segregate the useable lead component from the remaining, unusable materials. It accomplishes this through the use of a secondary lead smelter, using a process which is standard throughout the industry. JCBGI retains ownership of the lead throughout the reclamation process. As noted, the lead has considerable commercial value. When recovered, it is reformulated into "ingots" or "pigs" for direct and immediate reuse in the fabrication of lead acid batteries by JCBGI. JCBGI closely tracks the value represented by this lead and monitors the efficiency of the Doe Run recovery operations to assure that it is receiving maximum value from its reclamation.

In short, there is no concept of "discard" or "waste" associated with the lead reclamation. The material is reclaimed. It is not in any sense a "waste."

I trust that this letter will satisfy the agency's concerns. JCBGI's lead reclamation operations make both economic and environmental sense and should be encouraged. If you have any questions, please call me at (414) 228-2459.

Sincerely,

JOHNSON CONTROLS BATTERY GROUP, INC.

Debbie Hastings, CHMM
Senior Environmental Engineer

cc. Chuck Giesige, Geneva
Tom Schoen, Geneva
Brad Fearnley, Geneva
Tim Lafond
Jane Clokey, Quarles and Brady

RCRA COMPLIANCE EVALUATION INSPECTION REPORT
U.S. ENVIRONMENTAL PROTECTION AGENCY, REGION 5

Purpose: RCRA Compliance Evaluation Inspection

Facility: Johnson Controls - Battery Division
300 South Glengarry Drive
Geneva, IL 60134

Facility ID Number: ILD980502470

Date of Inspection: February 3, 1998

EPA Representatives:

Patrick F. Kuefler
Environmental Scientist
(312) 353-6268

Brian Holtrop
Environmental Engineer
(312) 353-5103

Ivonne Vincente
Environmental Engineer
(312) 886-4449

Facility Representatives:

Bradley M. Fearnley
Senior Process Engineer
(630)232-4270

Tom O'Brien
Process Engineer
(630)232-4270

Report Prepared by:

Patrick F. Kuefler

Inspection

The Inspection was conducted without prior notice to the facility. The inspection began at approximately 9:15 am with a in-briefing meeting with Bradley M. Fearnley, Senior Process Engineer and Tom O'Brien, Process Engineer. Facility organizational charts are provided as **Attachment C**. During the meeting a general overview of the facility's production and waste handling processes was provided by the facility and arrangements were made to obtain RCRA related documents for later review.

Following the discussion of the facility processes, the inspection team, accompanied by Mr. Fearnley and Mr. O'Brien, inspected several of the facility's production areas and all of the significant waste accumulation areas.

The inspection consisted of following the battery manufacturing process and viewing several waste generation areas to observe satellite accumulation conditions, inspection of the 90-day hazardous waste accumulation areas and the waste shipping area. A facility map is provided as **Attachment D**.

Containers of hazardous waste accumulated in the scrap room were stacked on pallets three tiers high and without the required aisle space. Also noted at the entrance of the scrap room was a container of lead contaminated floor sweepings that was being accumulated in satellite. The satellite container was being stored open while not in use.

Upon completion of the physical inspection of the facility, the rest of the afternoon was used reviewing required hazardous waste records including the continency plan, manifest, waste analysis, and training records.

Document Review

Manifests - Hazardous wastes manifests generated during the last year were reviewed for completeness including the presence of LDR forms. No discrepancies were noted.

Training Records - Training records were reviewed for compliance with 40 CFR 265.16 requirements. The records were complete with the exception of the lack of a written job description for Victor

JOHNSON CONTROLS INC.
ILD980502470
RCRA INSPECTION REPORT

March 1998

Introduction

On 2/3/98 the United States Environmental Protection Agency(EPA) conducted a Resource Conservation and Recovery Act (RCRA) Compliance Evaluation Inspection(CEI)at Johnson Controls Inc. (JC) located at 300 South Glengarry Drive in Geneva, Kane County, Illinois.

Facility Background

JC operates a lead/acid battery manufacturing facility and employs approximately 295 people at this location. The batteries produced at the facility are used primarily in motor vehicles. The facility generates several waste streams. Most of the hazardous waste streams are generated from lead contaminated residues and by-products.

The facility has been inspected in the past by the Illinois Environmental Protection Agency (IPA) in 1982 and twice in 1988. The 1982 inspection appears to have primarily focussed on determining applicability of permit requirements. The 1988 inspections found labeling, training, and aisle space violations.

In 1988, the facility requested withdrawal of their permit application. IEPA denied the request based on a review of manifest information which indicated hazardous waste storage had occurred on-site. Final closure of a tank storage units was achieved on September 5, 1997.

At the time of the inspection the facility was operating as a Large Quantity Generator of hazardous waste(LQG). The 1996 Annual Hazardous Waste Report is provided as **Attachment A** and a list of the primary waste streams (characteristic sludges and byproducts) sent for reclamation is provided by **Attachment B**.

Fernandez in violation of 40 CFR 265.16(d)(2).

Continency Plan - The contingency plan reviewed during the inspection found no discrepancies.

Waste Analysis Records - Waste analysis records for the facility's major waste streams were reviewed. No discrepancies were noted.

Inspection Records - No deficiencies

A photo log of the inspection is provided as **Attachment E**.

Potential Violations

1. **I.A.C. Section 725.135 [40 CFR 265.35]** Aisle Space must be maintained to allow the unobstructed movement of personnel, and equipment to any area of the facility operation. At the time of the inspection, 55-gallon containers holding hazardous waste located in the scrap room were stored in a manner obstructing inspection and spill response access to several containers.

2. **I.A.C. Section 725.273(a) [40 CFR 265.173(a)]** Containers collecting hazardous waste located at or near the point of generation (satellite accumulation) must be kept closed except when adding or removing waste from the container. During the inspection, a satellite accumulation container holding hazardous waste located at the entrance of the scrap room was observed open while waste was neither being added or removed.

3. **I.A.C. 722.134(a) [40 CFR 262.34/40 CFR 265.16(a)(4)]** JCB failed to provide a written job description for all hazardous waste personnel. The written job description for Victor Fernandez was not provided during the inspection.

LIST OF ATTACHMENTS

Attachment A	Annual Report 1996
Attachment B	List of Major Waste streams
Attachment C	Facility Organizational Chart
Attachment D	Facility Map
Attachment E	Photo Log
Attachment F	Inspection Checklist

A

Johnson Controls, Inc.
Battery Group
300 South Glengarry Drive
Post Office Box 270
Geneva, IL 60134
Tel. 630/232 4270

JOHNSON CONTROLS

February 27, 1997

IL. Environmental Protection Agency
Bureau of Land #24
1001 N. Grand Ave. E
Springfield, IL 62702-3998

RE: 1996 Hazardous Waste Report

Dear Sir of Madam:

Enclosed please find Johnson Controls Battery Group, Geneva Plant, 1996 Hazardous Waste Report.

Should you have any questions please call me.

Sincerely,

Thomas W. O'Brien

Thomas W. O'Brien
Process Engineer

cc: C. Giesige
B. Fearnley

Enclosure

ILD 980 502 470   089 03506 03

JOHNSON CONTROLS BATTERY GROUP
300 S GLENGARRY
GENEVA IL
60134

ILLINOIS Environmental Protection Agency
1996 Hazardous Waste Report
Form IC -- Identification and Certification

Instructions for this form found on pages 6-11
This form must be completed for the location shown on the above label. If you need additional forms for other locations, call IEPA.

SECTION 1. GENERATOR STATUS

A. 31 __1__ RCRA Generator Status (*enter one code*)
- 1 = LQG
- 2 = SQG
- 3 = CESGQ
  } Skip to Box C
- 4 = Nongenerator (continue to Box B)

B. Reason for not generating (*Check all that apply*)
- 32 ___ Never generated
- 33 ___ Out of business
- 34 ___ Only excluded or delisted waste generated
- 35 ___ Only non-hazardous waste generated
- 36 ___ Periodic generator, none in reporting year
- 37 ___ Waste minimization activity
- 38 ___ Other (*specify in comments box*)

C. 39 __1__ Status Time Period: 1= Expected to be the same next year and following years 2 = Expected to change next year

SECTION 2. ENTER THE SIC CODE(S) FOR THIS LOCATION

40 __3 6 9 1__ 44 ___ ___ ___ ___ 48 ___ ___ ___ ___ 52 ___ ___ ___ ___

SECTION 3. ON-SITE WASTE MANAGEMENT STATUS (*enter one code for each question*)

A. 56 __1__ RCRA regulated (permitted or interim status) storage
B. 57 __1__ RCRA permitted or interim status treatment, disposal, or recycling
C. 58 __1__ Treatment, disposal, or recycling exempt from RCRA permit requirements

SECTION 4. WASTE MINIMIZATION ACTIVITY DURING THE REPORTING YEAR. *(Only LQGs are required either to complete Section IV or submit detailed waste minimization description (see page 3).)*

A. 59 __Y__ Does your facility have a waste minimization plan or organized approach to investigate source reduction and recycling opportunities? *Enter Y for Yes* (Continue to Question B) *or N for No* (Skip to Question C)

B. Enter Y (Yes) for all activities that describe your waste minimization program.
- a. 60 __Y__ Set a waste minimization goal
- b. 61 __Y__ Use team approach for planning
- c. 62 __Y__ Provide employee training
- d. 63 __Y__ Identify types and amounts of waste generated by various processes and their causes
- e. 64 __Y__ Assess total costs of waste management
- f. 65 __Y__ Prioritize waste minimization options based on costs, benefits and feasibility
- g. 66 __Y__ Periodically update the program and re-evaluate options
- h. 67 __Y__ Encourage employees to offer waste minimization suggestions
- i. 68 ___ Incorporate waste minimization into procurement, marketing and product development activities
- j. 69 ___ Other (*describe in comments box*)

C. What kind of incentives would you like to see developed to help promote more source reduction activity at your facility? *Enter Y (Yes) for all that apply.*
- a. 70 __Y__ Tax incentives
- b. 71 ___ Loan assistance for equipment
- c. 72 __Y__ Compliance flexibility
- d. 73 ___ On-site technical assistance
- e. 74 ___ Regulatory compliance assistance
- f. 75 ___ Employee training
- g. 76 ___ R&D assistance
- h. 77 __Y__ Expedited permit review
- i. 78 ___ Other (enter comments on separate page)

D. Would you like to receive information on waste minimization? *Enter Y (Yes) for information requested.*
- a. 79 ___ General information packet on how to develop a plan for eliminating or reducing waste
- b. 80 ___ Fact sheet on industry or process-specific source reduction options
- c. 81 ___ On-site technical consultation
- d. 82 __Y__ Information on future conferences and workshops

Comments: 83 ___ *Enter Y (Yes) if you have comments regarding this page and attach extra sheet.*

Section 5. The Environmental Protection Agency is authorized to require this information under the Illinois Compiled Statutes ('ILCS"), 1994 as amended, Chapter 415 ILCS 5/4 and 21. Disclosure of this information is required. Failure to disclose this information may result in civil and criminal penalties pursuant to 415 ILCS 5/42 and 44. This form has been approved by the Forms Management Center.

Certification: I certify under penalty of law that I have personally examined and am familiar with the information submitted in this and all attached documents, and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

A. Please print: Last Name __Giesige__ First Name __Charles__ B. Title __Plant Manager__

C. Signature __Charles R Giesige__ D. Date of Signature __2/27/97__

JOHNSON CONTROLS BATTERY GROUP
300 S GLENGARRY
GENEVA IL
60134

ILLINOIS Environmental Protection Agency
1996 Hazardous Waste Report
Form GM -- Generation and Management

Instructions for this form found on pages 12-27.

SECTION 1. WASTE DESCRIPTION

A. Waste Description: Lead contaminated waste acetic acid

B. EPA Hazardous Waste Code: (31) D008 (35) D002 (39) (43) (47)

C. SIC code: (51) 3691

D. Origin Code: (55) 1 System type: (56) M E. Source Code: (60) A59 (63) A94 (66)

F. Point of Measurement: (69) 1 G. Waste form code: (70) B103

H. Radioactive mixed: (74) 2 I. TRI Constituent: (75) 3

J. CAS numbers: 1. (76) 42000-00-0 2. (84) 3. (92)
4. (100) 5. (108)

SECTION 2. QUANTITY GENERATED

A. UOM: (116) 1 Density (117) 8.93 (*Same unit and density must be used for all quantities on this page*).

Quantity generated in: B. Previous reporting year: (121) 0.0

C. Current reporting year: (131) 55.0

D. QUANTITY MANAGED ON-SITE: Did this location manage some or all of this waste in exempt or regulated treatment, recycling, or disposal units **at this location?** (141) N Y = Yes (continue to system 1) N = No (skip to section 3)

On-Site System 1: System Type (142) M Status (146) Quantity managed on-site this year: (147)

On-Site System 2: System Type (157) Status (161) Quantity managed on-site this year: (162)

SECTION 3. OFF- SITE SHIPMENT

A. Was any of this waste shipped off site this reporting year? (177) Y Y = Yes (Continue to Site 1) N = No (Skip to Section 4)

SITE 1. Name and address of facility: Clean Harbors of Chicago
11800 South Stony Island Ave., Chicago, IL 60617

B. U.S. EPA ID No. of facility waste was shipped to: (173) ILD000608471

C. System type shipped to: (185) M077 D. Off-site availability code: (189) 1

E. Total quantity shipped in this reporting year: (190) 55.0

SITE 2. Name and address of facility:

B. U.S. EPA ID No. of facility waste was shipped to: (200)

C. System type shipped to: (212) M D. Off-site availability code: (216)

E. Total quantity shipped in this reporting year: (217)

SECTION 4. WASTE MINIMIZATION ACTIVITIES

A. Did you engage in any waste minimization activities for this reporting year? (227) N Y = Yes (Cont to Box B) N = No (Cont to Section 5)

B. Activity: (228) (231) (234) (237) (240) (243) C. Other Effects? (Y = Yes, N = No) (246)

D. How many new waste minimization activities were implemented in this reporting year for this waste? (247) (Number)

E. Quantity recycled in reporting year due to new activities: (248)

F. Activity/Production index: (258) G. Source Reduction quantity due to new activities: (261)

SECTION 5. REGULATED STORAGE

A. Did this site store RCRA wastes 90 days or more and then ship it off-site (to site shown in Section 3)? (Y=Yes, N=No) (271) N

B. Did this site store RCRA wastes on-site for more than 90 days but waste is in storage at year end: (y=Yes, N=No) (272) N

Quantity stored at year end and for 90 days or more, generated this reporting year: (273)

Quantity stored at year end that was generated prior to this reporting year: (283)

COMMENTS: (293) Y Enter Y (Yes) if you have comments regarding this page and attach extra sheet. Page 2 of 7 (13)

ILD 980 502 470 089 03500 05

Johnson Controls Battery Group
300 S Glengarry
Geneva IL 60134

Illinois EPA
1996 Hazardous Waste Report
Form : Comments

Comments:

Reference Section 1, Line J,

CAS number 42000-00-0 Lead Compounds

JOHNSON CONTROLS BATTERY GROUP
300 S GLENGARRY
GENEVA IL
60134

ILLINOIS Environmental Protection Agency
1996 Hazardous Waste Report
Form GM – Generation and Management

Instructions for this form found on pages 12-27.

SECTION 1. WASTE DESCRIPTION

A. Waste Description: Lead contaminated waste hydraulic oil

B. EPA Hazardous Waste Code: (31) D 0 0 8 (35) (39) (43) (47)

C. SIC code: (51) 3 6 9 1

D. Origin Code: (55) 1 System type: (56) M E. Source Code: (60) A 5 4 (63) A 5 9 (66) A

F. Point of Measurement: (69) 1 G. Waste form code: (70) B 2 0 6

H. Radioactive mixed: (74) 2 I. TRI Constituent: (75) 3

J. CAS numbers: 1. (76) 4 2 0 0 0 - 0 0 - 0 2. (84) 3. (92) 4. (100) 5. (108)

SECTION 2. QUANTITY GENERATED

A. UOM: (116) 1 Density (117) 7.90 (*Same unit and density must be used for all quantities on this page*).

Quantity generated in: B. Previous reporting year: (121) 7 7 0.0

C. Current reporting year: (131) 4 4 0.0

D. QUANTITY MANAGED ON-SITE: Did this location manage some or all of this waste in exempt or regulated treatment, recycling, or disposal units **at this location?** (141) N Y = Yes (continue to system 1) N = No (skip to section 3)

On-Site System 1: System Type (142) M Status (146) Quantity managed on-site this year: (147)

On-Site System 2: System Type (157) M Status (161) Quantity managed on-site this year: (162)

SECTION 3. OFF- SITE SHIPMENT

A. Was any of this waste shipped off site this reporting year? (172) Y Y = Yes (Continue to Site 1) N = No (Skip to Section 4)

SITE 1. Name and address of facility: Clean Harbors Services Inc.
11800 South Stony Island Ave., Chicago, IL 60617

B. U.S. EPA ID No. of facility waste was shipped to: (173) I L 0 0 0 0 6 0 8 4 7 1

C. System type shipped to: (185) M 0 6 1 D. Off-site availability code: (189) 1

E. Total quantity shipped in this reporting year: (190) 3 3 0.0

SITE 2. Name and address of facility: Clean Harbors of Braintree Inc.
385 Quincy Ave., Braintree, MA 02184

B. U.S. EPA ID No. of facility waste was shipped to: (200) M A D 0 5 3 4 5 2 6 3 7

C. System type shipped to: (212) M 0 6 1 D. Off-site availability code: (216) 1

E. Total quantity shipped in this reporting year: (217) 1 1 0.0

SECTION 4. WASTE MINIMIZATION ACTIVITIES

A. Did you engage in any waste minimization activities for this reporting year? (227) N Y = Yes (Cont to Box B) N = No (Cont to Section 5)

B. Activity: (228) W , (231) W , (234) W , (237) W , (240) W , (243) W C. Other Effects? (Y = Yes, N = No) (246)

D. How many new waste minimization activities were implemented in this reporting year for this waste? (247) (Number)

E. Quantity recycled in reporting year due to new activities: (248)

F. Activity/Production index: (258) G. Source Reduction quantity due to new activities: (261)

SECTION 5. REGULATED STORAGE

A. Did this site store RCRA wastes 90 days or more and then ship it off-site (to site shown in Section 3)? (Y=Yes, N=No) (271) N

B. Did this site store RCRA wastes on-site for more than 90 days but waste is in storage at year end: (y=Yes, N=No) (272) N

Quantity stored at year end and for 90 days or more, generated this reporting year: (273)

Quantity stored at year end that was generated prior to this reporting year: (283)

COMMENTS: (293) Y Enter Y (Yes) if you have comments regarding this page and attach extra sheet. Page 3 of 7 (13)

ILD 980 502 470 089 03500 05

Johnson Controls Battery Group
300 S Glengarry
Geneva IL 60134

Illinois EPA
1996 Hazardous Waste Report
Form : Comments

Comments:

Reference Section 1, Line J,

CAS number 42000-00-0 Lead Compounds

JOHNSON CONTROLS BATTERY GROUP
300 S GLENGARRY
GENEVA IL
60134

ILLINOIS Environmental Protection Agency
1996 Hazardous Waste Report
Form GM – Generation and Management

Instructions for this form found on pages 12-27.

SECTION 1. WASTE DESCRIPTION

A. Waste Description: Spent Hydrobromic Acid- metal cleaning operation

B. EPA Hazardous Waste Code: (31) D002 (35) D008 (39) ____ (43) ____ (47) ____

C. SIC code: (51) 3691

D. Origin Code: (55) 1 System type: (56) M ____ E. Source Code: (60) A02 (63) A____ (66) A____

F. Point of Measurement: (69) 1 G. Waste form code: (70) B103

H. Radioactive mixed: (74) 2 I. TRI Constituent: (75) 3

J. CAS numbers: 1. (76) 4200-00-0 2. (84) ____-____-__ 3. (92) ____-____-__

4. (100) ____-____-__ 5. (108) ____-____-__

SECTION 2. QUANTITY GENERATED

A. UOM: (116) 1 Density (117) 9.96 (*Same unit and density must be used for all quantities on this page*).

Quantity generated in: B. Previous reporting year: (121) 990.0

C. Current reporting year: (131) 1265.0

D. QUANTITY MANAGED ON-SITE: Did this location manage some or all of this waste in exempt or regulated treatment, recycling, or disposal units **at this location?** (141) N Y = Yes (continue to system 1) N = No (skip to section 3)

On-Site System 1: System Type (142) M____ Status (146) ____ Quantity managed on-site this year: (147) ____.__

On-Site System 2: System Type (157) M____ Status (161) ____ Quantity managed on-site this year: (162) ____.__

SECTION 3. OFF-SITE SHIPMENT

A. Was any of this waste shipped off site this reporting year? (172) Y Y = Yes (Continue to Site 1) N = No (Skip to Section 4)

SITE 1. Name and address of facility: Clean Harbors Services Inc.
11800 South Stony Island Ave., Chicago, IL 60617

B. U.S. EPA ID No. of facility waste was shipped to: (173) ILD000608471

C. System type shipped to: (185) M077 D. Off-site availability code: (189) 1

E. Total quantity shipped in this reporting year: (190) 1265.0

SITE 2. Name and address of facility:

B. U.S. EPA ID No. of facility waste was shipped to: (200) ____

C. System type shipped to: (212) M____ D. Off-site availability code: (216) ____

E. Total quantity shipped in this reporting year: (217) ____.__

SECTION 4. WASTE MINIMIZATION ACTIVITIES

A. Did you engage in any waste minimization activities for this reporting year? (227) N Y = Yes (Cont to Box B) N = No (Cont to Section 5)

B. Activity: (228) W____, (231) W____, (234) W____, (237) W____, (240) W____, (243) W____ C. Other Effects? (Y = Yes, N = No) (246) ____

D. How many new waste minimization activities were implemented in this reporting year for this waste? (247) ____ (Number)

E. Quantity recycled in reporting year due to new activities: (248) ____.__

F. Activity/Production index (258) ____.__ G. Source Reduction quantity due to new activities: (261) ____.__

SECTION 5. REGULATED STORAGE

A. Did this site store RCRA wastes 90 days or more and then ship it off-site (to site shown in Section 3)? (Y=Yes, N=No) (271) N

B. Did this site store RCRA wastes on-site for more than 90 days but waste is in storage at year end: (y=Yes, N=No) (272) N

Quantity stored at year end and for 90 days or more, generated this reporting year: (273) ____.__

Quantity stored at year end that was generated prior to this reporting year: (283) ____.__

COMMENTS: (293) Y Enter Y (Yes) if you have comments regarding this page and attach extra sheet. Page (13) 4 of 7

Comments:

Reference Section 1, Line J,

CAS number 42000-00-0 Lead Compounds

JOHNSON CONTROLS BATTERY GROUP
300 S GLENGARRY
GENEVA IL
60134

ILLINOIS Environmental Protection Agency
1996 Hazardous Waste Report
Form GM -- Generation and Management

Instructions for this form found on pages 12-27.

SECTION 1. WASTE DESCRIPTION

A. Waste Description: Lead contaminated floor sweepings and miscellaneous material

B. EPA Hazardous Waste Code: (31) D008 (35) (39) (43) (47)

C. SIC code: (51) 3691

D. Origin Code: (55) 1 System type: (56) M E. Source Code: (60) A91 (63) A92 (66) A

F. Point of Measurement: (69) 1 G. Waste form code: (70) B316

H. Radioactive mixed: (74) 2 I. TRI Constituent: (75) 3

J. CAS numbers: 1. (76) 420000-00-0 2. (84) 3. (92)
4. (100) 5. (108)

SECTION 2. QUANTITY GENERATED

A. UOM: (116) 3 Density (117) 9.00 (*Same unit and density must be used for all quantities on this page*).

Quantity generated in: B. Previous reporting year: (121) 7865.0

C. Current reporting year: (131) 260225.0

D. QUANTITY MANAGED ON-SITE: Did this location manage some or all of this waste in exempt or regulated treatment, recycling, or disposal units **at this location?** (141) N Y = Yes (continue to system 1) N = No (skip to section 3)

On-Site System 1: System Type (142) M Status (146) Quantity managed on-site this year: (147)

On-Site System 2: System Type (157) M Status (161) Quantity managed on-site this year: (162)

SECTION 3. OFF- SITE SHIPMENT

A. Was any of this waste shipped off site this reporting year? (172) Y Y = Yes (Continue to Site 1) N = No (Skip to Section 4)

SITE 1. Name and address of facility: Doe Run Company Resource Recycling Division
Highway KK, Boss, MO 65440

B. U.S. EPA ID No. of facility waste was shipped to: (173) MOD059200089

C. System type shipped to: (185) M011 D. Off-site availability code: (189) 1

E. Total quantity shipped in this reporting year: (190) 260225.0

SITE 2. Name and address of facility:

B. U.S. EPA ID No. of facility waste was shipped to: (200)

C. System type shipped to: (212) M D. Off-site availability code: (216)

E. Total quantity shipped in this reporting year: (217)

SECTION 4. WASTE MINIMIZATION ACTIVITIES

A. Did you engage in any waste minimization activities for this reporting year? (227) N Y = Yes (Cont to Box B) N = No (Cont to Section 5)

B. Activity: (228) W, (231) W, (234) W, (237) W, (240) W, (243) W C. Other Effects? (Y = Yes, N = No) (246)

D. How many new waste minimization activities were implemented in this reporting year for this waste? (247) (Number)

E. Quantity recycled in reporting year due to new activities: (248)

F. Activity/Production index: (258) G. Source Reduction quantity due to new activities: (261)

SECTION 5. REGULATED STORAGE

A. Did this site store RCRA wastes 90 days or more and then ship it off-site (to site shown in Section 3)? (Y=Yes, N=No) (271) N

B. Did this site store RCRA wastes on-site for more than 90 days but waste is in storage at year end: (y=Yes, N=No) (272) N

Quantity stored at year end and for 90 days or more, generated this reporting year: (273)

Quantity stored at year end that was generated prior to this reporting year: (283)

COMMENTS: (293) Y Enter Y (Yes) if you have comments regarding this page and attach extra sheet. Page 5 of 7 (13)

Comments:

Reference Section 1, Line J,

CAS number 42000-00-0 Lead Compounds

JOHNSON CONTROLS BATTERY GROUP
300 S GLENGARRY
GENEVA IL
60134

ILLINOIS Environmental Protection Agency
1996 Hazardous Waste Report
Form GM – Generation and Management

Instructions for this form found on pages 12-27.

SECTION 1. WASTE DESCRIPTION

A. Waste Description: Waste flourescent light bulbs

B. EPA Hazardous Waste Code: (31) D009 (35) (39) (43) (47)

C. SIC code: (51) 3691

D. Origin Code: (55) 1 System type: (56) M E. Source Code: (60) A99 (63) A (66)

F. Point of Measurement: (69) 1 G. Waste form code: (70) B316

H. Radioactive mixed: (74) 2 I. TRI Constituent: (75) 2

J. CAS numbers: 1. (76) 2. (84) 3. (92)
4. (100) 5. (108)

SECTION 2. QUANTITY GENERATED

A. UOM: (116) 3 Density (117) 4.00 (*Same unit and density must be used for all quantities on this page*).

Quantity generated in: B. Previous reporting year: (121) 2160.0

C. Current reporting year: (131) 2400.0

D. QUANTITY MANAGED ON-SITE: Did this location manage some or all of this waste in exempt or regulated treatment, recycling, or disposal units **at this location?** (141) N Y = Yes (continue to system 1) N = No (skip to section 3)

On-Site System 1: System Type (142) M Status (146) Quantity managed on-site this year: (147)

On-Site System 2: System Type (157) M Status (161) Quantity managed on-site this year: (162)

SECTION 3. OFF- SITE SHIPMENT

A. Was any of this waste shipped off site this reporting year? (172) Y Y = Yes (Continue to Site 1) N = No (Skip to Section 4)

SITE 1. Name and address of facility: Superior Special Services Inc.
1275 Mineral Springs Dr., Port Washington, WI 53074

B. U.S. EPA ID No. of facility waste was shipped to: (173) WID988566543

C. System type shipped to: (185) M012 D. Off-site availability code: (189) 1

E. Total quantity shipped in this reporting year: (190) 2400.0

SITE 2. Name and address of facility:

B. U.S. EPA ID No. of facility waste was shipped to: (200)

C. System type shipped to: (212) M D. Off-site availability code: (216)

E. Total quantity shipped in this reporting year: (217)

SECTION 4. WASTE MINIMIZATION ACTIVITIES

A. Did you engage in any waste minimization activities for this reporting year? (227) N Y = Yes (Cont to Box B) N = No (Cont to Section 5)

B. Activity: (228) W, (231) W, (234) W, (237) W, (240) W, (243) W C. Other Effects? (Y = Yes, N = No) (246)

D. How many new waste minimization activities were implemented in this reporting year for this waste? (247) (Number)

E. Quantity recycled in reporting year due to new activities: (248)

F. Activity/Production index: (258) G. Source Reduction quantity due to new activities: (261)

SECTION 5. REGULATED STORAGE

A. Did this site store RCRA wastes 90 days or more and then ship it off-site (to site shown in Section 3)? (Y=Yes, N=No) (271) N

B. Did this site store RCRA wastes on-site for more than 90 days but waste is in storage at year end: (y=Yes, N=No) (272) N

Quantity stored at year end and for 90 days or more, generated this reporting year: (273)

Quantity stored at year end that was generated prior to this reporting year: (283)

COMMENTS: (293) Enter Y (Yes) if you have comments regarding this page and attach extra sheet.

ILD 980 5.2 4.5 . 5 7 6 5 5 . 5 . .

JOHNSON CONTROLS BATTERY GROUP
300 S GLENGARRY
GENEVA IL
60134

ILLINOIS Environmental Protection Agency
1996 Hazardous Waste Report
Form TI -- Transporter Identification

Instructions for this form found on page 28.

1. U.S. EPA ID No. W I D 9 8 8 5 6 6 5 4 3 __ Illinois Special Waste Hauling Permit No. 1 5 0 7 __
   31 127
   Transporter Name and Address: Superior Special Services Inc.
   1275 Mineral Springs Dr.
   Port Washington, WI 53074

2. U.S. EPA ID No. M A D 0 3 9 3 2 2 2 5 0 __ Illinois Special Waste Hauling Permit No. 1 4 7 8 __
   43 131
   Transporter Name and Address: Clean Harbors Environmental Services Inc.
   1501 Washington St.
   Braintree, MA 02184

3. U.S. EPA ID No. I L D 0 0 7 8 1 4 8 2 5 __ Illinois Special Waste Hauling Permit No. 0 0 9 3
   55 135
   Transporter Name and Address: Beelman Trucking
   #4 Caine Dr.
   Madison, IL 62060

4. U.S. EPA ID No. M O R 0 0 0 0 0 0 9 7 6 __ Illinois Special Waste Hauling Permit No. 3 8 6 4
   67 139
   Transporter Name and Address: Buchheit Trucking Service Inc.
   Route 7, Box 239
   Perryville, MO 63775

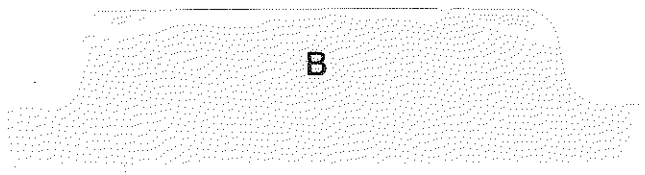
5. U.S. EPA ID No. ____________ Illinois Special Waste Hauling Permit No. ____
   79 143
   Transporter Name and Address:

6. U.S. EPA ID No. ____________ Illinois Special Waste Hauling Permit No. ____
   91 147
   Transporter Name and Address:

7. U.S. EPA ID No. ____________ Illinois Special Waste Hauling Permit No. ____
   103 151
   Transporter Name and Address:

8. U.S. EPA ID No. ____________ Illinois Special Waste Hauling Permit No. ____
   115 155
   Transporter Name and Address:

COMMENTS: ___ Enter Y(Yes) if you have comments regarding this page and attach extra sheet. Page 7 of 7
159 13


B

Geneva Waste Handling Procedures

Hazardous Waste

WWT – sludge – goes as HW because of low lead cont.

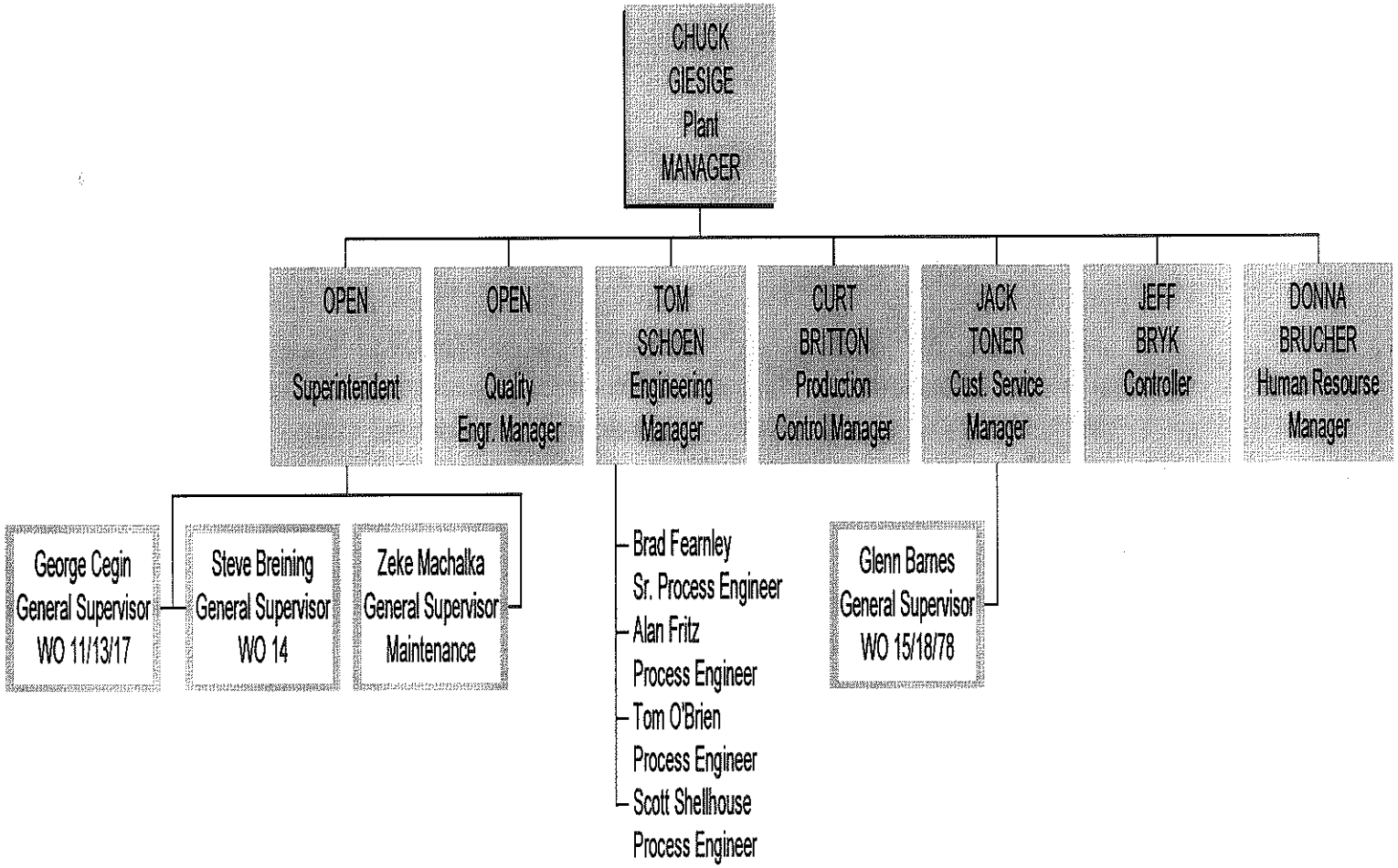
- Pasting Belts
- Stacking Boards
- Respirator Cartridges
- Gloves
- Tyvek suits, aprons
- Rags
- Lead contaminated cardboard, paper
- Sawdust (Floorsweepings)
- ✓ Lead contaminated waste oil (D008)
- ✓ Waste flux (Hydrobromic Acid)
- Lead contaminated waste acetic acid (D008, D002)
- Waste fluorescent light bulbs (D009)

By-product Material

- Drosses – from melting Pb
- Pollution control equipment (baghouse bags, filters) inside & outside
- ✓ Wastewater treatment sludge from "scrap room" outside as WWT goes HW "Paste"
- Plates
- Grids
- Scrap batteries – returns & both filled with acid & non filled
- Paste, lead oxide and other lead residues – slimming, bad Paste mix.
- Polypropylene contaminated with lead – covers with post/connectors
- Separators contaminated with lead PVC liner
- Acid dump/fill solids – acid fill tanks when bat. are dipped – sludges
- Sump muds → trenches channels.
- Scrap lead – cables, misc.

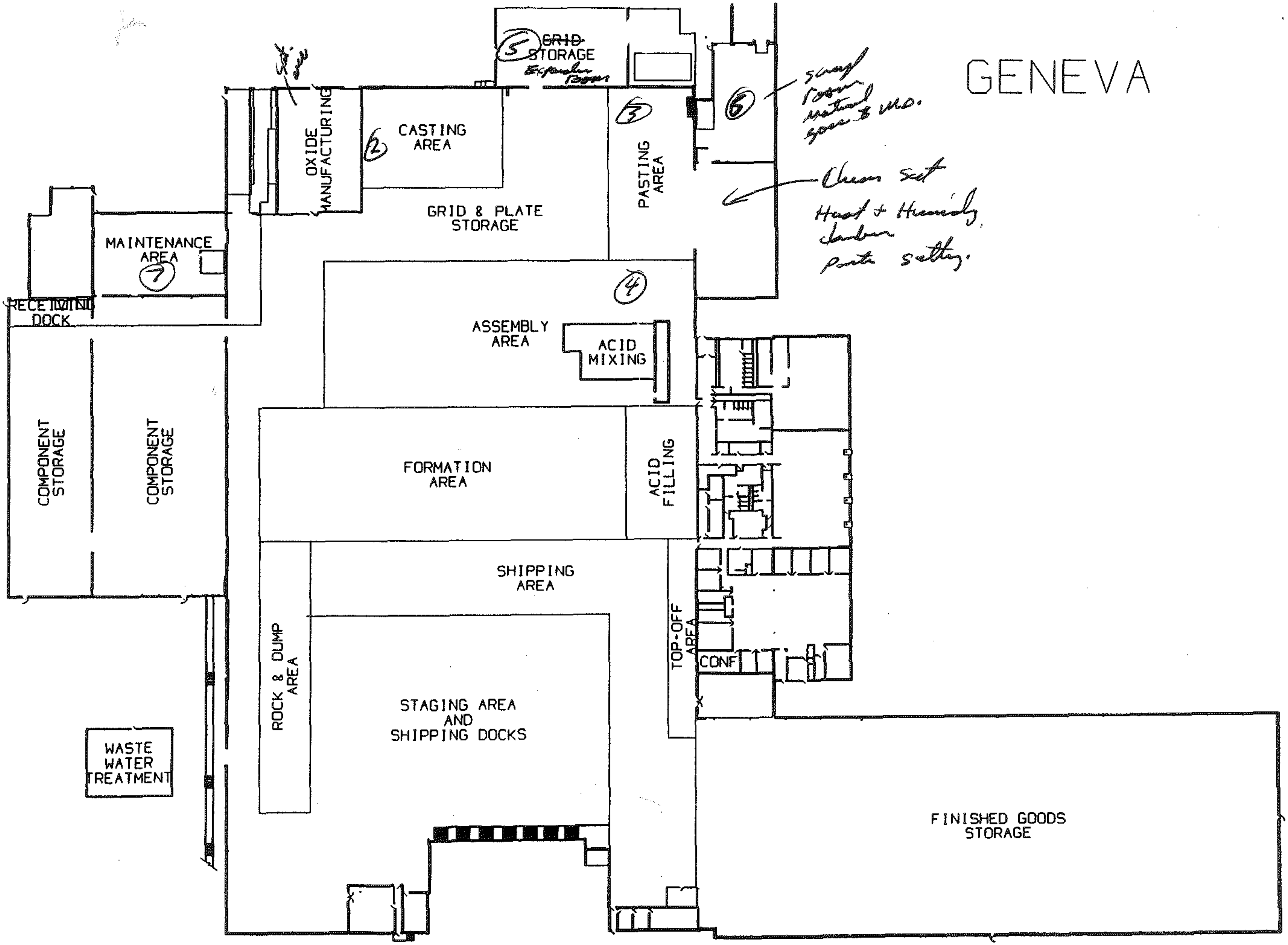
GENEVA

STAFF & GENERAL SUPERVISORS



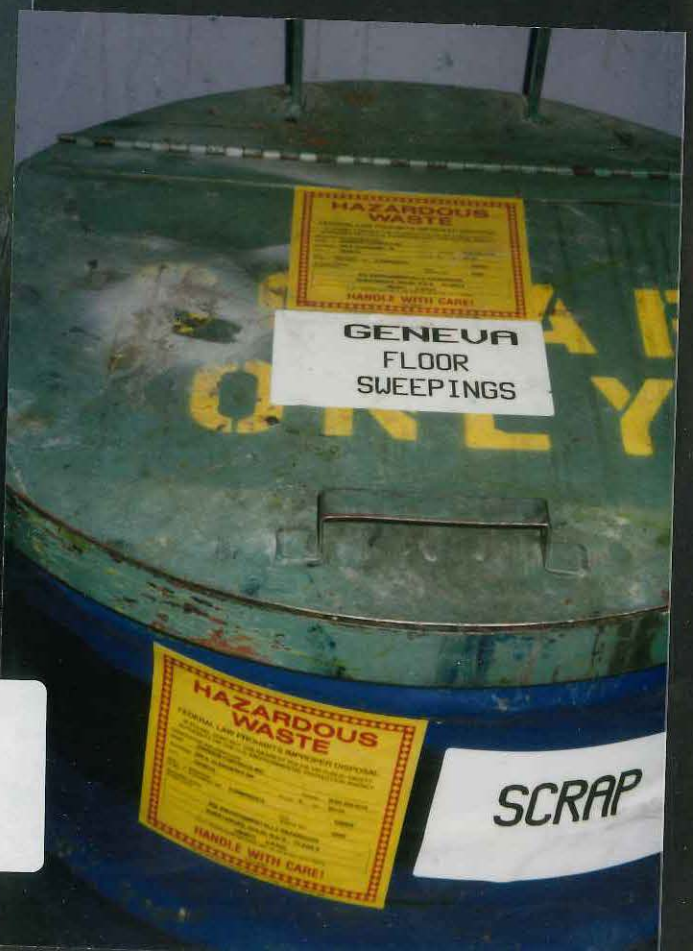
Effective: 2/3/98

GENEVA

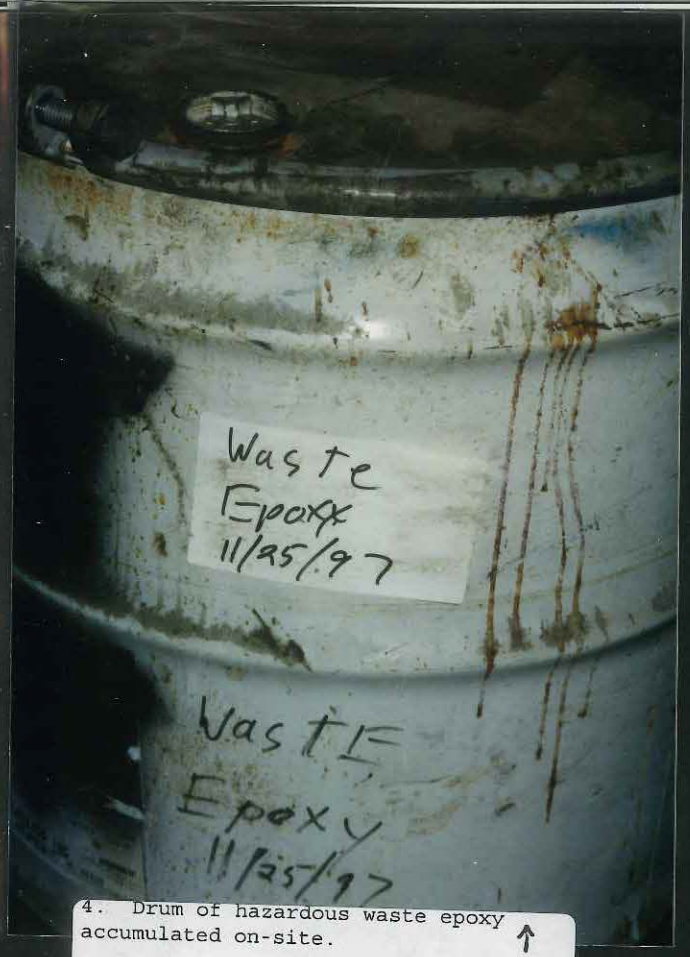

GRID STORAGE
OXIDE MANUFACTURING
CASTING AREA
PASTING AREA
GRID & PLATE STORAGE
MAINTENANCE AREA
RECEIVING DOCK
ASSEMBLY AREA
ACID MIXING
COMPONENT STORAGE
COMPONENT STORAGE
FORMATION AREA
ACID FILLING
SHIPPING AREA
TOP-OFF AREA
CONF
ROCK & DUMP AREA
STAGING AREA AND SHIPPING DOCKS
WASTE WATER TREATMENT
FINISHED GOODS STORAGE
2
3
4
5
6
7

1. Scrap plastic battery covers accumulated for shipment to a secondary lead smelter.

2. Satellite accumulation container holding lead contaminated floor sweepings. Also mislabeled as scrap.



3. View of label of waste drum of waste shown in photo #2.

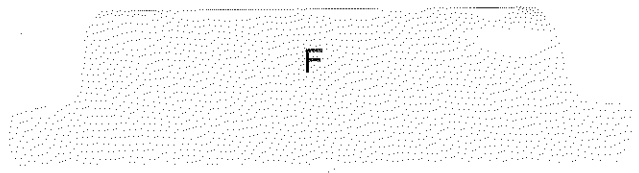


4. Drum of hazardous waste epoxy accumulated on-site. ↑

5. Accumulation of off-specification lead plates. ↑

6. Overview of the scrap room. Waste and material stored in this location is shipped to a secondary lead smelter. ↓

7. Scrap battery cables collected for lead recovery. ↓


F

Illinois Environmental Protection Agency
Division of Land Pollution Control

RCRA INSPECTION REPORT

USEPA #: IL D980502470		IEPA #:	
Facility Name: Johnson Controls – Battery Div.		Phone #: 630 232-4270	
Street Address: 300 South Glengarry Dr		County: DuPage	
City: Geneva	State: IL	Zip: 60134	
Region: Maywood	Inspection Date: 2/3/98	From: 9:00	To: 3:00
Weather: clear – cold			

TYPE OF FACILITY

Notified As: TSD	Regulated As: LQG
LDF? (Yes or Not) HPV?	90-Day F/U Required?: YES _____ NO _____

TYPE OF INSPECTION

CEI: X	Sampling: _____	Citizen Complaint: _____	Closed: _____	Other: _____
CME/O&M: _____	Record Review: _____	Follow-Up to Inspection of: _____	Withdrawal: _____	

NON-REGULATED STATUS

SQG: _____ Claimed Nonhandler: _____ Other (Specify in Narrative): _____

PART A closed 9/5/97 Generator only

Notification Date: ___/___/___, from (initial) or (subsequent) Notification.

Initial Part A Date: ___/___/___ Amended: ___/___/___

Part A Withdrawal requested: ___/___/___ Approved by (US)(IL) EPA: ___/___/___

PART B PERMIT APPLICATION

Part B Permit Submitted: Y or N ___/___/___ Final Permit Issued: ___/___/___

ENFORCEMENT

Has the firm been referred to -- USEPA: Y or N ___/___/___

Illinois Attorney General: Y or N ___/___/___ County State's Attorney: Y or N ___/___/___

N/A

ORDERS ISSUED

CACO: ___/___/___ CAFO: ___/___/___ Consent Decree: ___/___/___

Federal Court Order: ___/___/___ State Court Order: ___/___/___ IPCB Order: ___/___/___

TSD FACILITY ACTIVITY SUMMARY

Activity by Process Code	On Part A?	Activity Conducted Prior to 1980?	Was Activity Ever Done?	Closed	Being done at Time of Insp.?	Exempt per 35 IAC, Sec.	On Annual Report 19	19	19

OWNER		OPERATOR	
Name	Same as front	Name	Same
Address		Address	
City		City	
State	Zip	State	Zip
Phone #		Phone #	

PERSON(S) INTERVIEWED	TITLE	PHONE #
Bradley Fearnley	S. Process Eng.	630 232-4270
Tom O'Brien	Process Eng	" "

INSPECTION PARTICIPANT(S)	AGENCY/TITLE	PHONE #
Pat Kuefler	EPA - Scientist	312-353-6268
Brian Holtrop	EPA - Eng	3-5103
Ivonne Vincente	EPA-Eng	886-4449

PREPARED BY	AGENCY/TITLE	PHONE #
Kuefler		3-6268

SUMMARY OF APPARENT VIOLATIONS

Area	Class	Section
GPT	2	725.135
GPT	2	725.273a
GPT	2	722.134.a

Area	Class	Section

Area	Class	Section

Regulation	RCRA GENERATOR INSPECTION CHECKLIST (PART 722)	Violation
	Part 722: Standards Applicable to Generators of Hazardous Waste (>1000 Kg/mo.)	
	Subpart A: General	
	Section 722.111: Hazardous Waste Determination	
722.111	Has the generator correctly determined if the solid waste(s) it generates is a hazardous waste? Yes ✓ No ____ N/A ____	722.111
	Have hazardous wastes been identified for purposes of compliance with Part 728? Yes ✓ No ____ N/A ____	
808.121(a)	Has the generator correctly determined if the solid waste(s) it generates is a special waste? Yes ✓ No ____ N/A ____	808.121(a)
	Section 722.112: USEPA Identification Numbers	
722.112(a)	Has the generator obtained a USEPA identification number? Yes ✓ No ____ N/A ____	722.112(a)
722.112(c)	Has the generator offered its hazardous waste only to transporters or to treatment, storage or disposal facilities that have a USEPA identification number? Yes ✓ No ____ N/A ____	722.112(c)
	Subpart B: The Manifest	
	Section 722.120: General Requirements	
722.120(a)	Does the facility manifest its waste off-site? Yes ✓ No ____ N/A ____	722.120(a)
722.120(b)	Does the manifest designate a facility permitted to handle the waste? Yes ✓ No ____ N/A ____	722.120(b)
722.120(d)	Has the generator shipped any waste that could not be delivered to the designated facility? Yes ____ No ____ N/A ✓	722.120(d)
	Section 722.121: Acquisition of Manifests	
	Has the generator used:	
722.121(a)	-an Illinois manifest for wastes designated to a facility within Illinois? Yes ✓ No ____ N/A ____	722.121(a)
722.121(b)	- a manifest from the State to which the manifest is designated? Yes ✓ No ____ N/A ____	722.121(b)
	- an Illinois manifest if the State to which the waste is designated has no manifest of its own? Yes ✓ No ____ N/A ____	
	Section 722.122: Number of Copies	
722.122	Does the manifest consist of at least 6 copies? Yes ✓ No ____ N/A ____	722.122
	Section 722.123: Use of the Manifest	
	For each manifest reviewed, has the generator:	
722.123(a)	- signed the certificate by hand? Yes ✓ No ____ N/A ____	722.123(a)
	- obtained the handwritten signature and the date of acceptance by the initial transporter? Yes ✓ No ____ N/A ____	
	- retained one copy as required by Section 722.140(a)? Yes ✓ No ____ N/A ____	
	- apparently sent a copy (part 5 for the Illinois manifest) to the Agency within 2 working days? Yes ✓ No ____ N/A ____	
722.123(b)	- has the generator apparently given the remaining copies to the transporter? Yes ✓ No ____ N/A ____	722.123(b)

Regulation	RCRA GENERATOR INSPECTION CHECKLIST (PART 722)	Violation
722.123(c)	– has the generator followed the procedures prescribed in Section 722.123 for manifesting bulk shipments of hazardous waste by rail or water? Yes____ No____ N/A✓	722.123(c)
	Subpart C: Pre–Transport Requirements	
	Is there any hazardous waste ready for transport off–site? Yes✓ No____ N/A____	
	If so, is the generator complying with the pre–transport requirements in Subpart C? Yes✓ No____ N/A____	
	Section 722.134: Accumulation Time	
722.134(a)	Has the generator complied with the following requirements: Yes____ No✓ N/A____	722.134(a)
722.134(a)(1)	A) For waste in containers, has the generator complied with the requirements of Part 725, Subpart I? Yes____ No✓ N/A____	
	and/or	
	B) For waste in tanks, has the generator complied with the requirements of Part 725, Subpart J (except Sections 725.297(c) and 725.300)? Yes____ No____ N/A✓	
	and/or	
	C) For waste on drip pads, has the generator complied with the requirements of Part 725, Subpart W and maintained the required records identified in this subsection? Yes____ No____ N/A✓	
	and/or	
	D) For waste in containment buildings, has the generator complied with Part 725, Subpart DD and maintained the required records identified in this subsection? Yes____ No____ N/A✓	
722.134(a)(2)	For waste in containers, has the generator marked and made visible for inspection on each container, the date upon which accumulation began? Yes✓ No____ N/A____	
722.134(a)(3)	For waste in containers and tanks, has the generator marked or labeled each with the words "Hazardous Waste"? Yes✓ No____ N/A____	
722.134(a)(4)	Has the generator complied with the requirements of Part 725, Subparts C and D, and Sections 725.116 and 728.107(a)(4)? Yes✓ No____ N/A____	
	Specifically, the requirements of items 1 and/or 4 above (listed by regulation) which need to be complied with are as follows: satellite container stored open	
	Does the facility accumulate hazardous waste in containers? Yes✓ No____ N/A____	
	If "No", go to Subpart J.	

Regulation	RCRA GENERATOR INSPECTION CHECKLIST (PART 722)	Violation
	Subpart I: Use and Management of Containers	
	Has the generator closed an accumulation area? Yes____ No✓ N/A____	
(725.211) (725.214)	If "Yes", was the accumulation area closed in accordance with Sections 725.211 and 725.214? Yes____ No____ N/A✓	
(725.271)	If the containers have leaked or are in poor condition, has the owner/operator transferred the hazardous waste to a suitable container? Yes____ No____ N/A✓	
(725.272)	Is the waste compatible with the container and/or liner? Yes____ No____ N/A✓	
(725.273a)	Are containers of hazardous waste always closed except to remove or add waste during accumulation? Yes____ No✓ N/A____	
(725.273b)	Are containers of hazardous waste being opened, handled, or stored in a manner which will prevent the rupture of the container or prevent it from leaking? Yes✓ No____ N/A____	
(725.274)	Is the owner/operator inspecting the accumulation area(s) at least weekly, looking for leaks or deterioration? Yes✓ No____ N/A____	
	Is the accumulation area free from any evidence of leaking or deteriorating containers? (See also Section 725.131) Yes✓ No____ N/A____	
(725.276)	Are containers holding ignitable or reactive wastes located at least 15 meters (50 feet) from the facility's property line? Yes____ No____ N/A✓	
	Note: See Section 725.117(a) for additional requirements for ignitable, reactive or incompatible wastes.	
(725.277)	Is the owner/operator complying with the requirements concerning incompatible wastes? Yes✓ No____ N/A____	
	Comments:	
	Does the generator accumulate and/or treat hazardous waste in tanks? Yes____ No✓ N/A____	
	Note: If "No", go to Subpart C.	

Regulation	RCRA GENERATOR INSPECTION CHECKLIST (PART 722)	Violation
	Subpart C: Preparedness and Prevention	
(725.131)	Is the facility being operated and maintained to minimize the possibility of a fire, explosion or any release of hazardous waste or hazardous waste constituents which could threaten human health or the environment? Yes ✓ No____ N/A____	
(725.132)	Is the facility equipped with the following, if necessary: a) an internal communication or alarm system(s)? Yes ✓ No____ N/A____ b) a telephone or other device to summon emergency assistance from local authorities? Yes ✓ No____ N/A____ c) portable fire extinguishers, fire control equipment, spill control equipment and decontamination equipment? Yes ✓ No____ N/A____ d) water at adequate volume and pressure for fire control? Yes ✓ No____ N/A____	
(725.133)	Is the facility testing and maintaining communication/alarm system(s), fire protection equipment, spill control equipment and decontamination equipment? Yes ✓ No____ N/A____	
(725.134)	a) Where hazardous waste is being handled, do all employees have immediate access to an internal alarm or other emergency communication device? Yes ✓ No____ N/A____ b) If there is ever just one employee on the premises when the facility is operating, does he/she have immediate access to a device capable of summoning external emergency assistance? Yes ✓ No____ N/A____	
(725.135)	Is the facility maintaining adequate aisle space? Yes____ No ✓ N/A____	
(725.137)	Has the facility attempted to make the following arrangements, as appropriate, for the type of facility and waste: – arrangements with local emergency authorities (i.e. police and fire departments, other emergency response agencies) to familiarize them with the layout of the facility, properties of hazardous waste handled, places where facility personnel would be working, entrances to roads inside the facility and evacuation routes? Yes ✓ No____ N/A____ – agreements designating the primary authority where more than one police or fire department might respond? Yes ✓ No____ N/A____ – agreements with State emergency response teams, contractors and equipment suppliers? Yes ✓ No____ N/A____ – arrangements to familiarize local hospitals with the properties of hazardous waste handled at the facility and the type of injuries or illnesses which could result from fires, explosions or releases at the facility? Yes ✓ No____ N/A____	
	Subpart D: Contingency Plan and Emergency Procedures	
(725.151a)	Is the contingency plan available? Yes ✓ No____ N/A____ If "No", skip to Section 725.155. Is the plan designed to protect human health and the environment from releases to the air, soil and water? Yes ✓ No____ N/A____	
(725.151b)	Has there been a fire, explosion or release of hazardous waste? Yes ~~✓~~ IK No ✓ N/A____ If "Yes", has the contingency plan been carried out immediately? Yes____ No____ N/A ✓	

Regulation	RCRA GENERATOR INSPECTION CHECKLIST (PART 722)	Violation
(725.152a)	Does the plan describe the actions required for response to:	
	– fires? Yes ✓ No ____ N/A ____	
	– explosions? Yes ✓ No ____ N/A ____	
	– releases? Yes ✓ No ____ N/A ____	
(725.152c)	Does the plan describe arrangements with:	
	– police and fire departments? Yes ✓ No ____ N/A ____	
	– hospitals? Yes ✓ No ____ N/A ____	
	– contractors? Yes ✓ No ____ N/A ____	
	– emergency response teams? Yes ✓ No ____ N/A ____	
(725.152d)	Does the plan contain the current emergency coordinator's name, phone (office and home) and address? Yes ✓ No ____ N/A ____	
(725.152e)	Does the plan identify all emergency equipment including:	
	– description? Yes ✓ No ____ N/A ____	
	– capability? Yes ✓ No ____ N/A ____	
	– location? Yes ✓ No ____ N/A ____	
	Is the list of emergency equipment up–to–date? Yes ✓ No ____ N/A ____	
(725.152f)	Does the plan include:	
	– an evacuation plan? Yes ✓ No ____ N/A ____	
	– an evacuation signal? Yes ✓ No ____ N/A ____	
	– alternate evacuation routes? Yes ✓ No ____ N/A ____	
(725.153)	Has the contingency plan (including all revisions) been:	
	a) maintained at the facility? Yes ✓ No ____ N/A ____	
	b) submitted to:	
	– police department? Yes ✓ No ____ N/A ____	
	– fire department? Yes ✓ No ____ N/A ____	
	– hospital? Yes ✓ No ____ N/A ____	
	– emergency response teams? Yes ✓ No ____ N/A ____	
(725.154)	Has the contingency plan been reviewed and revised whenever:	
	a) regulations are revised? Yes ✓ No ____ N/A ____	
	b) the plan fails in an emergency? Yes ✓ No ____ N/A ____	
	c) the facility changes in a way that modifies the emergency response necessary? Yes ✓ No ____ N/A ____	
	d) information regarding emergency coordinators changes? Yes ✓ No ____ N/A ____	
	e) information regarding equipment changes? Yes ✓ No ____ N/A ____	
(725.155)	Is the emergency coordinator on–site or on call at all times? Yes ✓ No ____ N/A ____	
	Is the emergency coordinator familiar with all facility activities, wastes, records, layout and contingency plan? Yes ✓ No ____ N/A ____	
	Does the emergency coordinator have the authority to commit the resources needed to carry out the actions specified in the contingency plan? Yes ✓ No ____ N/A ____	
(725.156)	If the facility has had a release, fire or explosion, have the procedures of this Section been followed regarding assessment, response and reporting? Yes ____ No ____ N/A ✓	
	Note: If the facility has had a release, explain in detail.	

Regulation	RCRA GENERATOR INSPECTION CHECKLIST (PART 722)	Violation
	Section 725.116: Personnel Training	
(725.116a)	Does the facility have a training program? Yes ✓ No____ N/A____	
	Have facility personnel successfully completed a program of classroom or on-the-job training that teaches them to perform their duties in a way that ensures the facility's compliance with the requirements of Part 725? Yes ✓ No____ N/A____	
	Is the program directed by a person trained in hazardous waste management procedures? Yes ✓ No____ N/A____	
	Does the program teach facility personnel hazardous waste management procedures (including contingency plan implementation) relevant to the positions in which they are employed? Yes ✓ No____ N/A____	
	Does the program cover, at a minimum:	
	– procedures to familiarize facility personnel with emergency procedures, emergency equipment and emergency systems? Yes ✓ No____ N/A____	
	– procedures for using, inspecting, repairing and replacing facility emergency and monitoring equipment? Yes ✓ No____ N/A____	
	– key parameters for automatic waste feed cut-off systems? Yes ✓ No____ N/A____	
	– communications or alarm systems? Yes ✓ No____ N/A____	
	– response to fire or explosions? Yes ✓ No____ N/A____	
	– response to groundwater contamination incidents? Yes ✓ No____ N/A____	
	– shutdown of operations? Yes ✓ No____ N/A____	
(725.116b)	Have new employees completed the program within 6 months of the date of employment or assignment to a position requiring them to manage hazardous waste? Yes ✓ No____ N/A____	
(725.116c)	Have facility personnel received an annual review of the initial training? Yes ✓ No____ N/A____	
(725.116d)	Are the following documents and records being maintained at the facility:	
	1) the job title for each position related to hazardous waste management and the name(s) of the employee(s) filling each job? Yes ✓ No____ N/A____	
	2) a written job description for each position above, including the requisite skill, education or other qualifications and duties of personnel assigned to each position? Yes____ No ✓ N/A____ None for Victor Fernandez	
	3) a written description of the type and amount of both initial and continuing training that will be given to each person filling a position dealing with hazardous waste management? Yes ✓ No____ N/A____	
	4) records documenting that the training or job experience has been given to and completed by facility personnel? Yes ✓ No____ N/A____	
(725.116e)	Is the facility maintaining training records until closure of the facility and those of former employees for at least 3 years from the last date of employment? Yes ✓ No____ N/A____	

Regulation	RCRA GENERATOR INSPECTION CHECKLIST (PART 722)	Violation
	Section 728.107: Waste Analysis and Recordkeeping	
(728.107a4)	Has the generator who treats a prohibited waste in tanks or containers in order to meet the treatment standards developed and followed a waste analysis plan? Yes ✓ No____ N/A ✓	
	Is the plan on-site? Yes____ No____ N/A ✓	
	Does the plan include a detailed physical and chemical analysis? Yes____ No____ N/A ✓	
	Has the plan been filed with the Agency at least 30 days prior to commencement of treatment activity? Yes____ No____ N/A ✓	
	Has the generator submitted the required notification and certification that the waste meets treatment standards when the waste is shipped off-site? Yes____ No____ N/A ✓	
	Subsection 722.134(c): Satellite Accumulation	
722.134(c)	Is the generator who accumulates hazardous waste at or near any point of generation where wastes initially accumulate and which is under the control of the operator of the process generating the waste limiting such accumulation to 55 gallons of hazardous waste or 1 quart of acutely hazardous waste marking the containers with the words "Hazardous Waste" or other words identifying the contents? Yes ✓ No____ N/A____	722.134(c)
	Has the generator who accumulates more than 55 gallons of hazardous waste or 1 quart of acutely hazardous waste complied with the requirements of Section 722.134(a) within 3 working days? Yes ✓ No____ N/A____	
	If there are more than 55 gallons of hazardous waste or 1 quart of acutely hazardous waste in the satellite accumulation area, are the containers marked with the date accumulation began? Yes ✓ No____ N/A____	
	During the 3 day period, is the generator continuing to comply with the requirements of Section 722.134(c)(1) with respect to the excess waste? Yes ✓ No____ N/A____	
	Subpart D: Recordkeeping and Reporting	
	Section 722.140: Recordkeeping	
722.140(a)	Has the generator retained for a period of 3 years: – a copy of each signed manifest? Yes ✓ No____ N/A____	722.140(a)
722.140(b)	Has the generator retained a copy of each Annual Report and Exception Report for a period of at least three years from the due date of the report (March 1)? Yes ✓ No____ N/A____	722.140(b)
722.140(c)	Has the generator retained for a period of 3 years: – copies of test results, waste analyses or other determinations made in accordance with Section 722.111? Yes ✓ No____ N/A____	722.140(c)
722.140(d)	Does a generator who is involved in any unresolved enforcement action or as requested by the Director continue to maintain the records required in subsections a) and c)? Yes____ No____ N/A ✓	722.140(d)
	Section: 722.141: Annual Reporting	
722.141(a)	Has the generator who ships hazardous waste off-site for treatment, storage or disposal filed an annual report with the Agency by March 1 for the preceding calendar year? Yes ✓ No____ N/A____	722.141(a)
	Note: If "No", or if deficiencies are noted with the annual report reviewed, contact the Planning and Reporting Section.	

Regulation	RCRA GENERATOR INSPECTION CHECKLIST (PART 722)	Violation
722.141(b)	Has the generator who treats, stores or disposes of hazardous waste on-site, filed an annual report with the Agency by March 1 for the preceding calendar year? Yes ✓ No____ N/A____	722.141(b)
	Section 722.142: Exception Reporting	
722.142(a)(1)	If the generator has not received a copy of the manifest from the TSD facility within 35 days of the date of delivery to the transporter, has the generator contacted the transporter or the TSD facility to determine the status of the hazardous waste? Yes____ No____ N/A ✓	722.142(a)(1)
722.142(a)(2)	If the generator has not received a copy of the signed manifest within 45 days of the date of delivery to the transporter, has he filed an exception report with the Agency in accordance with the requirements of this Section? Yes____ No____ N/A ✓	722.142(a)(2)
	Section 722.143: Additional Reporting	
722.143	Has the generator furnished additional reports as required by the Director? Yes____ No____ N/A ✓	722.143
	Subpart E: Exports of Hazardous Waste	
	Is the generator an exporter of hazardous waste? Yes____ No____ N/A ✓ If "Yes", has the generator complied with the requirements of Subpart E? Yes____ No____ N/A ✓	
	Subpart F: Imports of Hazardous Waste	
	Is the generator an importer of hazardous waste? Yes____ No____ N/A ✓ If "Yes", has the generator complied with the requirements of Subpart F? Yes____ No____ N/A ✓	
	Subpart G: Farmers	
	Is the generator a farmer? Yes____ No____ N/A ✓ If "Yes", has the generator complied with the requirements of Subpart G? Yes____ No____ N/A ✓	
	Comments:	

P4X64S2517

Illinois Environmental Protection Agency · 2200 Churchill Road, Springfield, IL 62706

217/782-6761

Refer to: # 0890350005 -- Kane County
Johnson Controls, Inc.
ILD 980502470
RCRA - Permits

May 6, 1988

Johnson Controls, Inc.
300 S. Glengarry
Geneva, Illinois 60134

Attn: Environmental Coordinator or
Plant Manager

Dear Sir:

According to Agency files, your facility currently manages hazardous waste in containers and/or tanks subject to the requirements of 35 IAC 700-725. 35 IAC 703.157(f) states that interim status for any hazardous waste storage or treatment facility will be terminated November 8, 1992, unless the facility submits Part B of the RCRA permit application for these units to this Agency by November 8, 1988. This letter is written to (1) make you aware of this requirement and (2) describe the actions which must be taken in response to this requirement.

According to 35 IAC 703.157(f), if an existing facility desires to (1) store hazardous waste on-site for greater than ninety (90) days, (2) treat hazardous waste, or (3) store hazardous waste as a commercial facility after November 8, 1992, it must submit Part B of the RCRA permit application to this Agency by November 8, 1988. The information which must be contained in this application is described in 35 IAC 703, Subpart D. The enclosed document, entitled "RCRA Permit Guidance" provides more detail regarding the necessary contents of the application and also identifies several guidance documents which will be useful in developing the application. Also included in this document is the form which must be used when submitting the application.

If a facility does not desire to continue storing and/or treating hazardous waste after November 8, 1992, it must close the storage and/or treatment unit(s) present at the facility prior to this date. Closure, in this instance, basically means that all contamination must be removed from the unit(s) and if necessary, from the area surrounding these units. The requirements which must be met in closing these units are contained in 35 IAC 725, Subpart G. For you convenience, guidance for the development of a closure plan is contained in the enclosed document entitled "Instructions for the Preparation of Closure Plans for Interim Status RCRA Hazardous Waste Facilities." PLEASE NOTE THAT A CLOSURE PLAN DOES NOT NEED TO BE SUBMITTED AT THIS TIME. IT MUST HOWEVER, BE SUBMITTED TO THE AGENCY NO LATER THAN MAY 8, 1992.

In some instances, there may be several interim status hazardous waste management units at a facility. The facility may desire to pursue a final RCRA permit for a portion of these units and close the rest of them. Because of the uncertainty associated with this option, all interim status units at a facility must be included in Part B of the RCRA permit application, unless a closure plan for the units being closed is submitted with the Part B. If a closure plan is submitted with the Part B, the application need only address those units which will remain in operation.

The only alternatives available for hazardous waste treatment and storage facilities to meet the requirements of 35 IAC 703.157(f) are (1) submit Part B of the RCRA permit application by November 8, 1988 or (2) close by November 8, 1992. However, some facilities may have previously filed Part A of the RCRA permit application in error and now feel that the hazardous waste management activities carried out at the facility do not require a RCRA permit (i.e. the Part A was filed for protective measures). If this is the case, the Agency requests that information supporting this position be submitted no later than November 8, 1988. The Agency can then review the information submitted and correct its records accordingly. The information which must be submitted to make this demonstration is contained in the enclosed document entitled "Facility Part A Withdrawal Request Form."

Finally, some facilities may have closed or are currently closing in accordance with an IEPA approved closure plan. (Please bear in mind this letter is going out to over 200 facilities; some closed facilities may inadvertently receive this letter.) In this instance, the Agency requests that a copy of (1) the closure plan approval letter and (2) the letter from the Agency accepting the certifications of the owner/operator and the rgistered professional engineer that closure was carried out in accordance with the approved closure plan (if closure has been completed) be submitted by November 8, 1988. The Agency will again be able to review this information and correct its records accordingly.

Because of the large number of facilities subject to the requirements of 35 IAC 703.157(f), the Agency requests that all facilities receiving this letter complete the enclosed form entitled "RCRA Permit Information Form." The form has been developed such that it can be used by a facility falling into any of the five categories described above (pursuing a final permit, planning to close, pursuing a permit for only a portion of the interim status units and closing the other units, protective filers, closed in accordance with an IEPA approved closure plan). This form must be submitted to the Agency no later than November 8, 1988, along with all required attachments. Failure to do so may subject a facility to enforcement under State and/or Federal regulations and possible monetary penalties up to $25,000 per day of noncompliance.

The RCRA Permit Information Form and all required attachments must be submitted in triplicate (original and two (2) copies) to the following address:

Permit Section, RCRA Unit
Division of Land Pollution Control
Illinois Environmental Protection Agency
2200 Churchill Road
P.O. Box 19276
Springfield, IL 62794-9276

If you have any questions regarding this letter, please contact Jim Moore at 217/782-9878.

Very truly yours,

Lawrence W. Eastep, P.E., Manager
Permit Section
Division of Land Pollution Control

LWE:JKM:dks/1238j/1244j/1-3

Enclosures

cc: Division File
Compliance
Maywood Region
USPEA Region V

ILLINOIS EPA
Environmental Protection Agency
1701 S. First Street Maywood, IL. 60153
312/345-9780

Notified as: Johnson Controls Inc,

Re: General - Kane County - Globe Battery Div. - USEPA No. ILT180010316

GIVEN RECYCLER CODE 5 3-17-82 MG

RECEIVED
MAR 11 1982
WASTE MANAGEMENT BRANCH
EPA, REGION V

g TSD PA
3-17-82
MG

March 8, 1982

copy to PA
Copy to notif
orig to B Stone

Globe Battery
300 S. Glengarry
Geneva, Illinois 60134

Attention: Brad Fearnley

Dear Mr. Fearnley:

Because you notified the USEPA of hazardous waste activities at your facility, the Illinois Environmental Protection Agency, under authorization of the USEPA, conducted an inspection of your facility on February 2, 1982. This inspection found that the USEPA hazardous waste regulations apparently do not now apply to your facility. Therefore, the Agency is recommending that you request in writing, within thirty (30) days of the date of this letter, to be deleted from the hazardous waste facility list. Please submit your request to:

exempt recycler-code 5 RJ Stone 3-17-82

Illinois Environmental Protection Agency
Division of Land/Noise Pollution Control
1701 South First Avenue - Suite 600
Maywood, Illinois 60153

Attention: Kenneth P. Bechely,
Northern Region Manager

Be sure to include your notification number (shown above) on all correspondence with the Agency.

Although it appears you currently are not required by specific USEPA hazardous waste regulations, subsequent RCRA revisions may apply to facilities such as yours as well as future State regulations. And, of course, you must ensure that any waste your facility produces or handles is stored, transported and disposed of in a safe, environmentally sound manner.

Sincerely,

Kenneth P. Bechely

Kenneth P. Bechely, Northern Region Manager
Field Operations Section
Division of Land/Noise Pollution Control

KPB:BPB:prb

Enclosure: Inspection Report

cc: Division File
Northern Region
U.S. E.P.A. - Region V

RECEIVED
3-19-82

ILLINOIS EPA

ILLINOIS ENVIRONMENTAL PROTECTION AGENCY

MEMORANDUM

TO: Division File LPC - 08903505 DATE: 2-3-82

FROM: Bean Benning ILT180010316

☐ Information only

SUBJECT: Kane Co. Geneva / Globe Battery Div.

☐ Response requested

Facility falls out of regulation under RCRA, as their wastes are either non-hazardous or exempt under 261.6 (reclamation). Although the facility is not regulated under RCRA, they are following many of the ISS standards, Training program, Inspection of storage areas, and Contingency plan for the various materials use in the manufacturing process. WASTES are transported using the IL manifest and permit System. They currently have permits for the waste/water sludge to Cortland/Engstrom in Dekalb Co. and Davis Junction/BFI in Ogle Co. Any spillage inside the plant would go into the treatment system and then to the local sanitary system. The facility will be requested to withdraw from the RCRA facility list.

Geneva/-0890350S
STATE IDENTIFICATION NUMBER
(If Applicable)

ILT180010316
EPA IDENTIFICATION NUMBER

RCRA INSPECTION REPORT - INTERIM STATUS STANDARDS
Form B Generator Inspection*
(40 CFR Part 262)

I. General Information:*

(A) Installation Name: Johnson Control Inc. - Globe Battery Div.

(B) Street: 300 South Glengarry

(C) City: Geneva (D) State: IL (E) Zip Code: 60134

(F) Phone: 312/ 232-4270 (G) County: KANE

(H) Date of Inspection: 2-2-82 Time of Inspection (From) 1:30 pm (To) 3:00 pm

(I) Weather Conditions: 25° Snow Cover

(J) Person(s) interviewed	Title	Telephone
Bradley Fearnley	Process Engineer	312/232-4270

(K) Inspection Participants	Agency/Title	Telephone
BRAD Benning	IEPA/EPS	312/345-9780
Charles Gruntman	IEPA/EPE	"

(L) Preparer Information

Name	Agency/Title	Telephone
BRAD Benning	IEPA/EPS	312/345-9780

*Do not use this form if Generator is also a treatment, storage, and/or disposal facility. Complete form "A" if the Generator is also a TSD facility.

Rev. 1-27-81/J.B.

XI. REMARKS

Use this section to briefly describe site activities observed at the time of the inspection. Note any possible violations of Interim Status Standards.

REMARKS: Globe Battery manufactures automotive batteries for retail sale. Their initial submission was for generator and storage of haz. waste contaminated with lead (0008), and possibly corrosive (0002). Our investigation reveals that this facility is not regulated under RCRA. 1) HAZ. WASTE 0002-0008 was listed as a precautionary measure, their annual volume of waste/water was listed due to the possibility of spills in the plant, which would be acid and lead, all waste/water is treated at the plant and discharged to the local sanitary system. 2) HAZ. waste 0008, is the waste/water sludge from the treatment plant, analysis shows this sludge to be non-hazardous as the level of lead was 3.4 ppm. 3) HAZ. Waste 0008, consists of scrap lead and contaminated trash, this waste is hazardous but is exempt under 261.6 as it is being reclaimed by a Smelting Company. Shipments of the 0008 waste are properly labeled and transported under the manifest system.

R. V. FITZSIMMONS AND ASSOC. INC.
CHEMICAL ANALYSTS AND CONSULTANTS
1860 Arthur Drive
West Chicago, Illinois 60185
312/231-0680

ANALYSIS REPORT FOR:

Globe-Union, Inc.
Batte ry Div.
1150 E. State St.
Geneva, IL

PURCHASE ORDER NO. G 99906 BL

DATE 11/11/80

Attn: Brad Fernley

REPORT OF CHEMICAL ANALYSIS: Of one sample of wastewater treatment sludge for:

% total solids
% Lead in leached solids

RESULTS:

% Total Solids - 14.73%

% Lead in Leach Solids - 3.27%

EP Toxicity

Procedure: 100.0 grams of the wet sludge was adjusted to pH = 5 with acetic acid over a 24 hour period. The filtrate (leachate) was tested for the following elements:

(values reported as parts per million - ppm - of the leached sample)

Cadmium	$<$.10 ppm
Chromium	- .03 ppm
Lead	- 3.4 ppm
Silver	- $<$.05 ppm
Mercury	$<$.0005 ppm
Barium	- $<$.50 ppm
Selenium	- $<$.30 ppm
Arsenic	- $<$.10 ppm

Johnson Controls, Inc.
5757 N. Green Bay Avenue
Post Office Box 591
Milwaukee, WI 53201
Tel. 414/228 1200
Milton C. Zilis
Vice President & General Manager

Version

Globe Battery Division

Mr. Karl J. Klepitsch
Waste Management Branch
U.S. E.P.A. Region V
230 South Dearborn Street
Chicago, IL 60604

February 8, 1984

Dear Mr. Klepitsch:

RE: Request for Information - Recycling

This letter is in response to your request for information, dated January 9, 1984, regarding the status of our facility in Geneva, Illinois (EPA ID No. ILD980502470). TSD, PA - 9

You are correct in your assessment that our facility currently recycles and reclaims its waste as described in 40 CFR Part 261.6. Nevertheless, in order to provide for future contingencies regarding our waste streams, the decision has been made to obtain a permit as a hazardous waste storage facility. We have reviewed the requirements associated with this course of action and feel it is in our best interest at this time. In accordance with your request, we have revised our Part A Permit Application and attached it for your review.

If you have any questions regarding the above, please contact Mr. Jean Beaudoin at (414) 228-2745.

Sincerely,

JOHNSON CONTROLS, INC.

Milton C. Zilis
Vice President & General Manager
Battery Division

cc: K. L. Kirby
J. M. Beaudoin
J. R. Meverden
B. Fearnley

MCZ/jak

JOHNSON CONTROLS

ILLINOIS EPA

Environmental Protection Agency

1701 S. First Street Maywood, IL. 60153

312/345-9780

Notified as: Johnson Controls Inc.

Re: General - Kane County - Globe Battery Div. - USEPA No. ILT180010316

GIVEN RECYCLER CODE 5 3-17-82 MG

g TSD PA 3-17-82 MG

RECEIVED MAR 11 1982 WASTE MANAGEMENT BRANCH EPA, REGION V

March 8, 1982

copy to PA
Copy to notif
orig to B Stone

Globe Battery
300 S. Glengarry
Geneva, Illinois 60134

Attention: Brad Fearnley

Dear Mr. Fearnley:

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exempt recycler-code 5 RJStone 3-17-82

Illinois Environmental Protection Agency
Division of Land/Noise Pollution Control
1701 South First Avenue - Suite 600
Maywood, Illinois 60153

Attention: Kenneth P. Bechely,
Northern Region Manager

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Sincerely,

Kenneth P. Bechely

Kenneth P. Bechely, Northern Region Manager
Field Operations Section
Division of Land/Noise Pollution Control

KPB:BPB:prb

Enclosure: Inspection Report

RECEIVED 3-17-82

cc: Division File
Northern Region
U.S. E.P.A. - Region V

D. Corrective Action

U.S. Environmental Protection Agency
Office of Waste Programs Enforcement
Contract No. 68-W9-0006

TES 9

Technical Enforcement Support at Hazardous Waste Sites Zone III Regions 5,6, and 7

PRC

PRC Environmental Management, Inc.

PRC Environmental Management, Inc.
233 North Michigan Avenue
Suite 1621
Chicago, IL 60601
312-856-8700
Fax 312-938-0118

PRELIMINARY ASSESSMENT/ VISUAL SITE INSPECTION

JOHNSON CONTROLS BATTERY GROUP, INC. (FORMERLY JOHNSON CONTROLS, INC. GLOBE BATTERY DIVISION) GENEVA, ILLINOIS ILD 980 502 470

FINAL REPORT

Prepared for

U.S. ENVIRONMENTAL PROTECTION AGENCY
Office of Waste Programs Enforcement
Washington, DC 20460

Work Assignment No.	:	R05032
EPA Region	:	5
Site No.	:	ILD 980 502 470
Date Prepared	:	March 31, 1994
Contract No.	:	68-W9-0006
PRC No.	:	309-R05032IL1L
Prepared by	:	PRC Environmental Management, Inc. (Kurt Whitman)
Contractor Project Manager	:	Shin Ahn
Telephone No.	:	(312) 856-8700
EPA Work Assignment Manager	:	Kevin Pierard
Telephone No.	:	(312) 886-4448

CONTENTS

FIGURES

TABLES

EXECUTIVE SUMMARY

PRC Environmental Management, Inc. (PRC), performed a preliminary assessment and visual site inspection (PA/VSI) to identify and assess the existence and likelihood of releases from the solid waste management units (SWMU) and other areas of concern (AOC) at the Johnson Controls Battery Group, Inc. (Johnson) facility in Geneva, Kane County, Illinois. This summary highlights the results of the PA/VSI and the potential for releases of hazardous wastes or hazardous constituents from SWMUs and AOCs identified.

The facility was built by Globe Union, Inc. (Globe), and began operating in 1961. In the 1970s, Johnson Controls, Inc. (Johnson Controls) purchased the facility from Globe and changed the facility name to the Johnson Controls, Inc. Globe Battery Division. In the late 1980s, Johnson Controls changed the name of the facility to Johnson Controls Battery Group, Inc. (Johnson) to limit liability. Since 1961, Globe, Johnson Controls, and Johnson have conducted the same battery manufacturing operations. The Johnson facility employs about 340 people.

Since 1961, the facility has manufactured lead acid batteries, primarily for use in automobiles. Molten lead from lead pots is mixed with air to produce lead oxide in the lead oxide mills. The lead oxide is mixed with sulfuric acid and water to form a lead oxide paste. The paste is pressed into grids and cured at a controlled humidity and temperature for 24 hours. The paste grids are then stacked with alternating positive and negative plates, and an insulator is placed between each layer. The formed positive and negative battery grids are then assembled using molten lead. After assembly, the grids are placed in a polypropylene plastic casing, and the positive and negative posts are sealed with molten lead. The batteries are then filled with sulfuric acid, sealed, and charged. Some of the batteries are shipped out to customers without being filled.

The following raw materials used by the facility: (1) lead ingots (possibly containing antimony or calcium), (2) sulfuric acid, (3) acetic acid, (4) hydrobromic acid, (5) methylene chloride, (6) Cast-On-Strap (COS) flux, (7) 20 percent sodium hydroxide solution, (8) epoxy solution, (9) petroleum oils, (10) wastewater treatment polymers, (11) polypropylene casings, (12) polyester fiber, (13) ferrous sulfate, and (14) spent citrisolvent.

The following processes generate waste at the facility: (1) wastewater treatment, (2) degreasing, (3) laboratory testing, (4) battery production, (5) maintenance, (6) air pollution control, (7) lead ingot melting using a Barton pot, (8) lead paste wash water treatment, and (9) vehicle repair.

Prior to 1992, the facility generated and managed the following waste streams: (1) wastewater treatment plant (WWTP) sludge (D008), (2) WWTP filter cake (D008), and (3) waste naphtha solvent (D001). The Johnson facility currently generates and manages the following waste streams: (1) spent carburetor cleaner (methylene chloride) (F001 and D008), (2) spent acetic acid (D002, D007, and D008), (3) spent sulfuric acid (D002 and D008), (4) Spent COS flux (hydrobromic acid) (D002, D004, D007, and D008), (5) spent hydrobromic acid and ethylene glycol (D002 and D008), (6) used oil (D008), (7) process wastewater (D002 and D008), (8) spent citrisolvent (nonhazardous), and (9) used oil (nonhazardous).

The facility also generates various lead-bearing wastes. These lead-bearing wastes are recycled by sending them off site to several lead reclamation and smelting facilities. The only exception was the WWTP sludge and WWTP filter cake, which were being sent to Envirite, Inc. (Envirite), an off-site treatment facility until 1992. The WWTP sludge was not generated after 1991. The WWTP sludge was stored in a 5,000-gallon aboveground storage tank, which the facility decommissioned before 1992. By 1992, the facility was sending all lead-bearing materials, including the WWTP filter cake, to a lead reclamation facility. All lead-bearing materials recycled by the facility are returned to them as lead ingots for reuse in their manufacturing process. At the time of the VSI, the facility claimed that lead-bearing wastes sent off site for recycling and returned as lead ingots were not considered RCRA hazardous wastes. Johnson could not provide documentation to support this claim. The following lead-bearing wastes are generated and managed by the facility and sent off site for recycling: (1) baghouse dust, (2) lead dross, (3) lead debris and floor sweepings, (4) lead paste wash water, (5) clean water treatment sludge, and (6) WWTP filter cake.

On June 8, 1981, the facility sent a Notification of Hazardous Waste Site Activity form to the U.S. Environmental Protection Agency (EPA) that indicated documented releases of sulfuric acid and process wastewater. All of these spills occurred before 1981. According to the information provided in this form, Johnson cleaned up all of these spills.

In October 1993, the facility notified the State of Illinois Emergency Management Agency (IEMA) that two separate leaks of petroleum-based fuels had occurred from a 8,000-gallon underground storage tank (UST) used to store diesel fuel and a 550-gallon UST used to store gasoline.

Johnson Controls submitted a Notification of Hazardous Waste Activity form to EPA on July 28, 1980. Johnson Controls submitted a RCRA Part A permit application on November 19, 1980, stating that the facility was a large-quantity generator handling the following EPA hazardous waste codes: D002 and D008. The permit application states that the facility has a 331,200-gallon tank storage capacity and a 150-gallon storage (S02) capacity. The facility is currently regulated as a treatment, storage, or disposal (TSD) facility.

IEPA inspected the facility on February 2, 1982. During this inspection, IEPA made a preliminary determination that the Johnson Controls facility did not fall under RCRA authority. The basis for IEPA's determination was (1) that the hazardous waste codes D002 and D008 were listed on the facility's RCRA Part A permit application as a protective measure, possibly because of the potential for spills from the various manufacturing processes; (2) that all wastewater containing lead was being treated by the facility at the WWTP (SWMU 2); and (3) that the scrap lead and trash (D008) at the facility were potentially exempt under 40 CFR 261.6 and were being reclaimed by an off-site smelting company. On March 8, 1992, IEPA recommended that Johnson withdraw its RCRA Part A permit application.

IEPA did not inspect the facility between 1982 and 1987. On March 11 and March 30, 1988, IEPA conducted two RCRA compliance inspections of the facility. During these inspections, IEPA found that the facility was not labeling its hazardous containers, had inadequate personnel training records, and had insufficient aisle space between its hazardous waste containers.

The PA/VSI identified the following nine SWMUs and three AOCs at the facility:

Solid Waste Management Units

1. Hazardous Waste Storage Area
2. Wastewater Treatment Plant (WWTP)
3. Baghouse Dust Collection Systems and Storage Areas
4. Drum Accumulation Areas
5. Clean Water Treatment System
6. Lead Scrap Storage Area
7. Lead Scrap Trailer Storage Area
8. Former Outside Hazardous Waste Storage Area
9. Used Oil Storage Area

Areas of Concern

1. Former Diesel Underground Storage Tank (UST)
2. Former Gasoline UST
3. Former Fuel Oil UST

The potential for release to groundwater, surface water, air, and on-site soils is low for SWMUs 1, 2, and 4 through 7 because the units are indoors and have adequate containment; there are concrete floors below the units; during the VSI, no evidence of release was noted; and no releases from these units have been documented.

During the VSI, a documented release was observed to on-site soil adjacent to one SWMU 3 area, therefore this unit poses a high potential for release surface water, air, and on-site soils is high for SWMU 3 because the unit areas are outdoors; they are not adequately contained to prevent a release; cracks in the concrete pad were visible; and during the VSI, one of the areas had visible signs of release. The potential for release to groundwater is moderate for SWMU 3 because only the surface soil was found to have a documented release, the release covers only a small area (less than 25 square feet), and no known releases to groundwater have been documented.

During the VSI, PRC observed evidence of a past release. The potential for release to groundwater, surface water, air, and on-site soils was moderate for SWMU 8 because the unit was outdoors; it consisted of an unsealed asphalt pad with no secondary containment and an unsealed gravel and dirt area is immediately west and adjacent to the unit; and a release from this unit was documented.

The potential for release to groundwater, surface water, air, and on-site soils is moderate for SWMU 9 because the unit is outside; it has an unsealed concrete pad; it has no secondary containment to contain potential spills; and a gravel parking lot is immediately adjacent to the ASTs.

The potential for release to groundwater, surface water, air, and on-site soils is unknown for AOCs 1 and 2 because the AOCs were outdoors and below ground, no soils were excavated when the USTs were removed, and known releases to on-site soils have occurred; however the level of petroleum-based contamination is unknown. The potential for release to groundwater, surface water, air, and on-site soils is unknown for AOC 3 because the AOC was outdoors and below ground; the AOC was not removed and according to facility representatives it was filled in with gravel; the level of contamination is unknown; and the location of the AOC is unknown.

The facility is bordered on the north by E and T Glass and Mirror, Inc., a vacant lot, and Allied Tubular Rivet, Inc., all located on Commerce Drive; on the west by a residential subdivision; on the south by railroad tracks and Waste Management, Inc.'s, Settler's Hill landfill; and on the east by Miner Enterprises, Inc., a railroad equipment manufacturer. The nearest residential area is located less than 0.1 mile west of the facility. The nearest school, Harrison Street School, is about 0.5 mile northwest of the facility. Facility access is restricted by a barbed wire fence, which surrounds the facility.

The nearest surface water body, an unnamed pond, is located on site and is used for recreational and industrial purposes. Other surface water bodies in the area include the Fox River, which is about 0.8 mile west of the facility. The Fox River is not used as a water supply for Geneva, Illinois.

The facility area is serviced by municipal water drawn from six City of Geneva wells. The closest municipal well is about 0.5 mile north of the facility. The next closest city well is about 0.8 mile west-southwest of the facility. Another well is about 1.2 miles southwest of the facility. The three remaining municipal wells are about 1.1, 1.6, and 1.9 miles northwest of the facility, respectively. All six municipal wells are upgradient of the facility. Groundwater in the area generally moves to the southeast. Geneva has no known private industrial or residential wells. No downgradient wells are known to be located within 3 miles of the facility. The Fox River is used as a municipal water supply for Aurora, Illinois. Aurora's intakes are located about 13 miles downstream from Geneva.

Sensitive environments are located on site east of the facility's manufacturing activities. A palustrine, unconsolidated bottom, intermittently exposed wetland pond is located on site. Other sensitive environments include various palustrine wetlands, which are from 0.1 mile to 2.0 miles east to southeast of the facility. Additionally, one palustrine, forested and emergent wetland area is located on the Fox River and is about 1.6 miles southwest of the facility. Fabyan Forest Preserve, a Kane County preserve, is about 0.9 mile south-southwest of the facility.

PRC recommends no further action for SWMU 1 at this time. For SWMU 3 PRC recommends that the facility should: (1) take corrective measures to prevent the release of baghouse dust, (2) seal the concrete pads, (3) remove/remediate contaminated soil, and (4) conduct weekly inspections of each area. For SWMU 5, PRC recommends that drums containing sludge be stored closed. For SWMU 8, PRC recommends that this unit undergo RCRA closure. For SWMU 9, PRC recommends that the facility construct a secondary containment berm around the unit to contain spills to comply with EPAs 40 Code of Federal Regulations Part 279 and the state of Illinois used oil management standards. PRC also recommends the facility characterize the lead-containing wastes managed at SWMUs 2, 3, 4, 5, 6, and 7 and sent off-site for reclamation.

For AOCs 1 and 2, PRC recommends that the facility sample soils to delineate the current extent of contamination. Based on the soil data, the analytical results may warrant the installation of groundwater monitoring wells upgradient and downgradient of the AOC. PRC recommends that the facility determine the location of AOC 3 and collect on-site soil samples to determine if a release has occurred. If soil contamination is detected, groundwater sampling may be warranted.

1.0 INTRODUCTION

PRC Environmental Management, Inc. (PRC), received Work Assignment No. R05032 from the U.S. Environmental Protection Agency (EPA) under Contract No. 68-W9-0006 (TES 9) to conduct preliminary assessments (PA) and visual site inspections (VSI) of hazardous waste treatment and storage facilities in Region 5.

As part of the EPA Region 5 Environmental Priorities Initiative, the RCRA and CERCLA programs are working together to identify and address RCRA facilities that have a high priority for corrective action using applicable RCRA and CERCLA authorities. The PA/VSI is the first step in the process of prioritizing facilities for corrective action. Through the PA/VSI process, enough information is obtained to characterize a facility's actual or potential releases to the environment from solid waste management units (SWMU) and areas of concern (AOC).

A SWMU is defined as any discernible unit at a RCRA facility in which solid wastes have been placed and from which hazardous constituents might migrate, regardless of whether the unit was intended to manage solid or hazardous waste.

The SWMU definition includes the following:

- RCRA-regulated units, such as container storage areas, tanks, surface impoundments, waste piles, land treatment units, landfills, incinerators, and underground injection wells
- Closed and abandoned units
- Recycling units, wastewater treatment units, and other units that EPA has usually exempted from standards applicable to hazardous waste management units
- Areas contaminated by routine and systematic releases of wastes or hazardous constituents. Such areas might include a wood preservative drippage area, a loading or unloading area, or an area where solvent used to wash large parts has continually dripped onto soils.

An AOC is defined as any area where a release of hazardous waste or constituents to the environment has occurred or is suspected to have occurred on a nonroutine and nonsystematic basis. This includes any area where a strong possibility exists that such a release might occur in the future.

The purpose of the PA is as follows:

- Identify SWMUs and AOCs at the facility
- Obtain information on the operational history of the facility
- Obtain information on releases from any units at the facility
- Identify data gaps and other informational needs to be filled during the VSI

The PA generally includes review of all relevant documents and files located at state offices and at the EPA Region 5 office in Chicago.

The purpose of the VSI is as follows:

- Identify SWMUs and AOCs not discovered during the PA
- Identify releases not discovered during the PA
- Provide a specific description of the environmental setting
- Provide information on release pathways and the potential for releases to each medium
- Confirm information obtained during the PA regarding operations, SWMUs, AOCs, and releases

The VSI includes interviewing appropriate facility staff; inspecting the entire facility to identify all SWMUs and AOCs; photographing all visible SWMUs; identifying evidence of releases; making a preliminary selection of potential sampling parameters and locations, if needed; and obtaining additional information necessary to complete the PA/VSI report.

This report documents the results of a PA/VSI of the Johnson Controls Battery Group, Inc. (Johnson) facility (EPA Identification No. ILD 980 502 470) in Geneva, Kane County, Illinois. The PA was

completed on December 13, 1993. PRC gathered and reviewed information from the Illinois Environmental Protection Agency (IEPA), U.S. Department of Agriculture (USDA), U.S. Department of Commerce (USDOC), U.S. Geological Survey (USGS), Illinois State Geological Survey (ISGS), Federal Emergency Management Agency (FEMA), National Wetland Inventory (NWI), and from EPA Region 5 RCRA files. The VSI was conducted on December 17, 1993. It included interviews with facility representatives and a walk-through inspection of the facility. PRC identified nine SWMUs and three AOCs at the facility.

The VSI is summarized and 15 inspection photographs are included in Appendix A. Photograph No. 9, the only photograph not associated with a SWMU or AOC, shows an area which the facility used to store empty drums. Field notes from the VSI are included in Appendix B.

2.0 FACILITY DESCRIPTION

This section describes the facility's location; past and present operations; waste generating processes and waste management practices; history of documented releases; regulatory history; environmental setting; and receptors.

2.1 FACILITY LOCATION

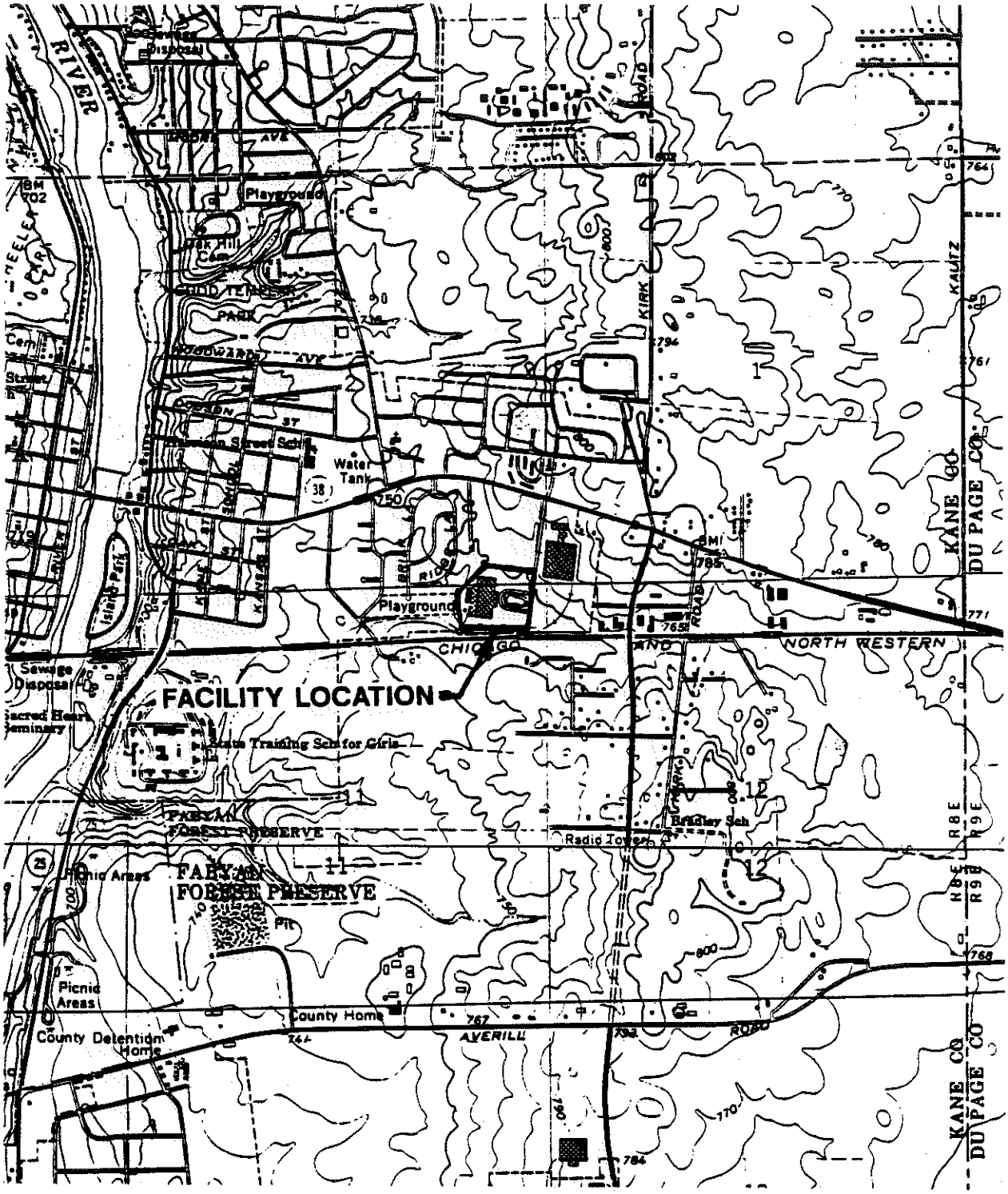
The Johnson facility is located at 300 South Glengarry Drive in Geneva, Kane County, Illinois. Figure 1 shows the location of the facility in relation to the surrounding topographic features (latitude 41°53'40" N and longitude 88°17'40" W) (Johnson Controls 1980b). The facility occupies 16.5 acres in a mixed-use area.

The facility is bordered on the north by E and T Glass and Mirror, Inc., a vacant lot, and Allied Tubular Rivet, Inc., all located on Commerce Drive; on the west by a residential subdivision; on the south by railroad tracks and Waste Management, Inc.'s, Settler's Hill landfill; and on the east by Miner Enterprises, Inc., a railroad equipment manufacturer.

2.2 FACILITY OPERATIONS

The facility was built by Globe Union, Inc. (Globe), and began operating in 1961. In the 1970s, Johnson Controls purchased the facility from Globe and changed the facility name to the Johnson Controls, Inc. Globe Battery Division. In the late 1980s, Johnson Controls changed the name of the facility to Johnson Controls Battery Group, Inc. (Johnson) to limit liability. Since 1961, Globe, Johnson Controls, and Johnson have conducted the same battery manufacturing operations at the facility. The Johnson facility employs about 340 people.

Since 1961, the facility has manufactured lead acid batteries, primarily for use in automobiles. Molten lead from lead pots is mixed with air to produce lead oxide in the lead oxide mills. The lead oxide is mixed with sulfuric acid and water to form a lead oxide paste. The paste is pressed into grids and cured at a controlled humidity and temperature for 24 hours. The paste grids are then stacked with alternating positive and negative plates, and an insulator is placed between each layer.



SCALE 1: 24000

1 1/2 0 1 MILE

1000 0 1000 2000 3000 4000 5000 6000 7000 FEET

SCALE 1"=2,000'

QUADRANGLE LOCATION

SOURCE: MODIFIED FROM USGS, AURORA NORTH AND GENEVA QUADRANGLES, 1978 AND 1980

JOHNSON CONTROLS, INC., BATTERY GROUP
GENEVA, ILLINOIS

FIGURE 1

FACILITY LOCATION

PRC ENVIRONMENTAL MANAGEMENT, INC.

The formed positive and negative battery grids are then assembled using molten lead. After assembly, the grids are placed in a polypropylene plastic casing, and the positive and negative posts are sealed with molten lead. The batteries are then filled with sulfuric acid, sealed, and charged. Some of the batteries are shipped out to customers without being filled (IEPA 1992a).

The following raw materials are used by the facility: (1) lead ingots (possibly containing antimony or calcium), (2) sulfuric acid, (3) acetic acid, (4) hydrobromic acid, (5) methylene chloride, (6) Cast-On-Strap (COS) flux, (7) 20 percent sodium hydroxide solution, (8) epoxy solution, (9) petroleum oils, (10) wastewater treatment polymers, (11) polypropylene casings, (12) polyester fiber, (13) ferrous sulfate, and (14) spent citrisolvent.

Solid wastes generated by facility operations and the SWMUs where they are managed are discussed in detail in Section 2.3.

2.3 WASTE GENERATION AND MANAGEMENT

Facility generation and management of both hazardous and nonhazardous wastes are discussed below. Wastes have been generated and managed at various locations at the facility. The facility's SWMUs and their current status are identified in Table 1. The locations of the facility's SWMUs and the facility layout are shown in Figure 2. Wastes generated at the facility are summarized in Table 2. The annual waste generation data presented in this section is based on data for 1990, 1991, and 1992.

The following processes generate waste at the facility: (1) wastewater treatment, (2) degreasing, (3) laboratory testing, (4) battery production, (5) maintenance, (6) air pollution control, (7) lead ingot melting using a Barton pot, and (8) vehicle repair.

Prior to 1992, the facility generated and managed the following waste streams: (1) wastewater treatment plant (WWTP) sludge (D008), (2) WWTP filter cake (D008), and (3) waste naphtha solvent (D001). The facility stopped managing the WWTP sludge (D008) as a hazardous waste at the end of 1991 when they began to send the waste to a reclamation facility. In 1991, the waste naphtha solvent's use was discontinued. The Johnson facility currently generates and manages the following waste streams: (1) spent carburetor cleaner (methylene chloride) (F001 and D008), (2) spent acetic

TABLE 1

SOLID WASTE MANAGEMENT UNITS

SWMU Number	SWMU Name	RCRA Hazardous Waste Management Unit[a]	Status
1	Hazardous Waste Storage Area	Yes	Active; greater than 90-day storage of hazardous wastes
2	Wastewater Treatment Plant (WWTP)	Yes	Active; wastewater treatment
3	Baghouse Dust Collection Systems and Storage Areas	No	Active; less than 90-day storage of lead-bearing material for reclamation
4	Drum Accumulation Areas	No	Active; accumulation of hazardous and lead-bearing material for reclamation
5	Clean Water Treatment System	No	Active; treatment of lead-bearing waste
6	Lead Scrap Storage Area	No	Active; less than 90-day storage of lead-bearing material for reclamation
7	Lead Scrap Trailer Storage Area	No	Active; less than 90-day storage of lead-bearing material for reclamation
8	Former Outside Hazardous Waste Storage Area	Yes	Inactive; facility discontinued use in October 1993
9	Used Oil Storage Area	No	Active; storage of nonhazardous used oil

Note:

[a] A RCRA hazardous waste management unit is one that currently requires or formerly required submittal of a RCRA Part A or Part B permit application.

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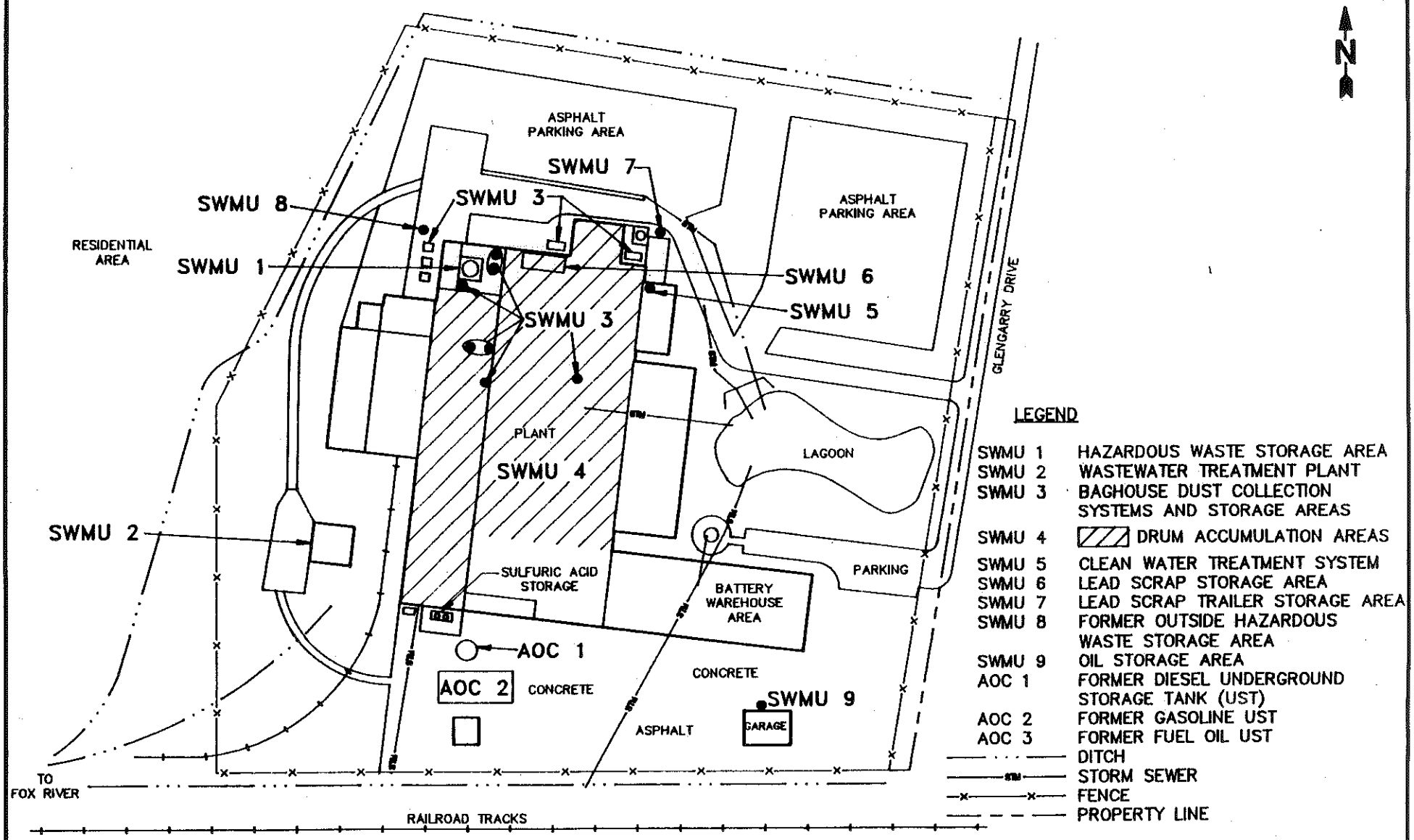

LEGEND

SWMU 1	HAZARDOUS WASTE STORAGE AREA
SWMU 2	WASTEWATER TREATMENT PLANT
SWMU 3	BAGHOUSE DUST COLLECTION SYSTEMS AND STORAGE AREAS
SWMU 4	DRUM ACCUMULATION AREAS
SWMU 5	CLEAN WATER TREATMENT SYSTEM
SWMU 6	LEAD SCRAP STORAGE AREA
SWMU 7	LEAD SCRAP TRAILER STORAGE AREA
SWMU 8	FORMER OUTSIDE HAZARDOUS WASTE STORAGE AREA
SWMU 9	OIL STORAGE AREA
AOC 1	FORMER DIESEL UNDERGROUND STORAGE TANK (UST)
AOC 2	FORMER GASOLINE UST
AOC 3	FORMER FUEL OIL UST

DITCH
STORM SEWER
FENCE
PROPERTY LINE

NOTES:

THE LOCATION OF AOC 3 IS UNKNOWN.

ABOUT 75 LOCATIONS OF SWMU 4 ARE PRESENT AT THE FACILITY.

60' 0 60' 180'

SCALE: 1" = 180'

SOURCE: MODIFIED FROM BAXTER AND WOODMAN 1993

JOHNSON CONTROLS, INC., BATTERY GROUP
GENEVA, ILLINOIS

FIGURE 2

FACILITY LAYOUT

PRC ENVIRONMENTAL MANAGEMENT, INC.

TABLE 2

SOLID WASTES

Waste/EPA Waste Code[a]	Source	Solid Waste Management Unit[b]
Former Wastes		
Wastewater treatment plant (WWTP) sludge/D008[c]	Wastewater treatment	2
WWTP filter cake/D008[c]	Wastewater treatment	2
Waste naphtha solvent/D001[c]	Degreasing	8
Current Wastes		
Spent carburetor cleaner (methylene chloride)/F001 and D008	Degreasing	1 or 8
Spent acetic acid/D002, D007, and D008	Laboratory testing	1 or 8
Spent sulfuric acid/D002 and D008	Battery production	2
Spent COS flux (hydrobromic acid)/D002, D004, D007, and D008	Battery production	1 or 8
Spent hydrobromic acid and ethylene glycol/D002 and D008	Battery production	1
Used oil/D008	Maintenance	1 or 8
Process wastewater/D002 and D008	Battery production	2
Baghouse dust/Not characterized[d]	Air pollution control	3, 6, and 7
Lead dross/Not characterized[d]	Barton melting pot	4, 6, and 7
Lead debris and floor sweepings/Not characterized[d]	Battery production	4, 6, and 7
Lead paste wash water/Not characterized[d]	Battery production	5

TABLE 2 (Continued)

SOLID WASTES

Waste/EPA Waste Code[a]	Source	Solid Waste Management Unit[b]
Clean water treatment sludge/ Not characterized[d]	Battery production	5, 6, and 7
WWTP filter cake/NA[e]	Wastewater treatment	2, 6, and 7
Spent citrisolvent/NA	Degreasing	None, removed and managed by a recycling company
Used oil/NA	Vehicle repair	9

Notes:

[a] Not applicable (NA) designates nonhazardous waste.

[b] "None" indicates that the waste is not managed on site.

[c] Until 1991 this waste stream was managed as a hazardous waste exhibiting the D008 characteristic.

[d] At the time of the VSI, the facility claimed that lead-bearing wastes sent off site for recycling and returned as lead ingots were not considered RCRA hazardous wastes.

[e] This waste stream was previously managed as a hazardous waste exhibiting the D008 characteristic. Since 1992, this waste has been reclaimed off site and the facility has claimed that it can be managed as a non-hazardous waste.

acid (D002, D007, and D008), (3) spent sulfuric acid (D002 and D008), (4) spent COS flux (hydrobromic acid) (D002, D004, D007, and D008), (5) spent hydrobromic acid and ethylene glycol (D002 and D008), (6) used oil (D008), (7) process wastewater (D002 and D008), (8) spent citrisolvent (nonhazardous), and (9) used oil (nonhazardous).

The facility also generates various lead-bearing wastes which have been recycled since the facility started operations. At the time of the VSI, the facility claimed that lead-bearing wastes sent off site for recycling and returned as lead ingots were not considered RCRA hazardous wastes. These lead-bearing wastes were recycled by sending them off site to several lead reclamation and smelting facilities.

The only exception was the WWTP sludge (D008) and the WWTP filter cake (D008), which were being sent to Envirite, Inc. (Envirite), an off-site treatment facility until 1992. By 1992, the facility had discontinued the generation of the WWTP sludge (D008). The WWTP sludge, which was stored in a 5,000-gallon aboveground storage tank (AST) at the WWTP, was removed, shipped to Envirite for treatment, and the AST was inactivated by the facility. By 1992, the facility was sending all lead-bearing wastes, including the WWTP filter cake, to a lead reclamation facility. At the time of the VSI, the following lead-bearing wastes were generated and managed by the facility: (1) baghouse dust, (2) lead dross, (3) lead debris and floor sweepings, (4) lead paste wash water, (5) clean water treatment sludge, and (6) WWTP filter cake.

Prior to 1992, about 40,000 gallons of WWTP sludge (D008) and WWTP filter cake (D008) were generated per year. This waste was generated during the treatment and neutralization of process wastewater (D002 and D008). This WWTP sludge was stored in a 5,000-gallon aboveground storage tank (AST) at the WWTP (SWMU 2). The WWTP filter cake was stored in drums at the WWTP (SWMU 2). Both wastes were transported off site by Envirite to their treatment facility in Harvey, Illinois.

Before 1992, the facility also generated about 50 gallons of waste naphtha solvent (D001) per year until the facility replaced their degreaser with less hazardous materials. This waste was generated during the degreasing of machinery and equipment. This waste was stored in drums at the Former Outside Hazardous Waste Storage Area (SWMU 8) until being shipped off site by an unknown

transporter to an unknown disposal facility. No data exists in EPA, State, or facility files on the transportation and disposal of this waste.

Currently, the facility generates about 500 gallons of spent carburetor cleaner (methylene chloride) (F001 and D008). This waste is generated from the degreasing of machinery and equipment, and is stored in drums at the Hazardous Waste Storage Area (SWMU 1). Before October 1993, the cleaner was stored at the Former Outside Hazardous Waste Storage Area (SWMU 8). This waste has always been transported off site by Clean Harbors, Inc. (Clean Harbors), to their treatment facility in Chicago, Illinois.

The facility generates about 50 gallons of spent acetic acid (D002, D007, and D008) per year. This waste is generated during the laboratory testing of lead-acid batteries, and is stored in drums at the Hazardous Waste Storage Area (SWMU 1). Before October 1993, the acid was stored at the Former Hazardous Waste Storage Area (SWMU 8) until being shipped off site by Clean Harbors to their treatment facility in Chicago, Illinois.

The facility generates an unknown quantity of spent sulfuric acid (D002 and D008). This waste is generated during the production of lead-acid batteries and is treated on site at the WWTP (SWMU 2). This waste is not shipped off site for disposal or treatment.

The facility generates about 1,200 gallons of spent COS flux (hydrobromic acid) (D002, D004, D007, and D008) per year. This waste is generated during the etching of lead-acid battery plates, and is stored in drums at the Hazardous Waste Storage Area (SWMU 1). Before October 1993, the spent COS flux was stored in drums at the Former Hazardous Waste Storage Area (SWMU 8). This flux is transported off site by Clean Harbors to their facility in Chicago, Illinois.

The facility generated about 55 gallons of spent hydrobromic acid and ethylene glycol (D002 and D008) on a one-time basis when the hydrobromic acid was accidentally contaminated with the glycol. This waste is stored in one drum at the Hazardous Waste Storage Area (SWMU 1) until being transported off site by Clean Harbors to their Chicago, Illinois facility.

The facility generates about 200 to 400 gallons of used oil (D008) per year. This waste is generated from the maintenance and draining of machinery, and is stored in drums at the Hazardous Waste Storage Area (SWMU 1). Before October 1993, the used oil was stored in drums at the Former Hazardous Waste Storage Area (SWMU 8). This used oil is transported off site by Clean Harbors to their Chicago, Illinois facility.

The facility generates about 15,000 gallons of process wastewater (D002 and D008) per day. This waste is generated during the production of lead-acid batteries and is treated and neutralized in bulk at the WWTP (SWMU 2).

The facility generates several lead-bearing waste streams that are sent off site for recycling. At the time of the VSI, the facility claimed that lead-bearing wastes sent off site for recycling and returned as lead ingots were not considered RCRA hazardous wastes. Johnson could not provide documentation to support this claim. Baghouse dust is generated by the air pollution control dust collectors and is stored in drums at the Baghouse Dust Collection Systems and Storage Areas (SWMU 3), the Lead Scrap Storage (SWMU 6), and the Lead Scrap Trailer Area (SWMU 7). Lead dross is generated when molten lead impurities that are floating on top of the Barton melting pot are skimmed. This waste is stored at the Drum Accumulation Areas (SWMU 4), the Lead Scrap Storage Area (SWMU 6), and the Lead Scrap Trailer Storage Area (SWMU 7). Lead debris and floor sweepings are generated during the production of lead-acid batteries and are accumulated and stored in drums at the Drum Accumulation Areas (SWMU 4), the Lead Scrap Storage Area (SWMU 6), and the Lead Scrap Trailer Storage Area (SWMU 7). Lead paste wash water is generated from the production of grids at the high speed lead pasting operation and is treated in bulk at the Clean Water Treatment System (SWMU 5). Generation rates of these wastes are unknown.

Clean water treatment sludge is generated during the treatment of lead paste wash water at the Clean Water Treatment System (SWMU 5). This waste is stored in drums at the Lead Scrap Storage Area (SWMU 6) and the Lead Scrap Trailer Storage Area (SWMU 7). WWTP filter cake is generated during the treatment of process wastewater and is stored in drums at the WWTP (SWMU 2), the Lead Scrap Storage Area (SWMU 6), and the Lead Scrap Trailer Storage Area (SWMU 7). In 1992, about 665,500 pounds of lead-bearing waste was reclaimed at the following lead smelting operations: (1) Doe Run, Inc., in Boss, Missouri, (2) Gopher Smelting, Inc., in Egan, Minnesota, and (3) RSR, Inc.,

in Indianapolis, Indiana. All lead bearing waste is transported off site by Parrish Carriers, Inc., of Freeburg, Illinois (Johnson 1994).

The facility generates about 50 gallons of spent citrisolvent (nonhazardous) per year. This waste is generated during the degreasing of machinery and equipment and is managed by an outside, unspecified recycling company. This waste is accumulated but not stored at the facility.

Used oil (nonhazardous), about 200 to 400 gallons per year, is generated from the vehicle repair and draining of used oil from truck engines and is stored at the Used Oil Storage Area (SWMU 9). This waste is transported off site by Texama, Inc., to their recycling facility in Chicago, Illinois.

2.4 HISTORY OF DOCUMENTED RELEASES

This section discusses the history of documented releases to groundwater, surface water, air, and on-site soils at the facility.

On June 8, 1981, the facility sent a Notification of Hazardous Waste Site Activity form to EPA that indicated documented releases of sulfuric acid and process wastewater. All of these spills occurred before 1981. According to the information provided in this form, Johnson cleaned up all of these spills (Johnson Controls 1981).

In October 1993, the facility notified the State of Illinois Emergency Management Agency (IEMA) that two separate leaks of petroleum-based fuels had occurred from an 8,000-gallon underground storage tank (UST) used to store diesel fuel and a 550-gallon UST used to store gasoline (Johnson 1993a). Both USTs have been removed by the facility; however, no further action has occurred to investigate the extent of contamination or if contaminated, remediate the surrounding groundwater and on-site soils. The two UST releases are discussed in detail in Section 4.0.

During the VSI, the inspection team noted a release of baghouse dust to on-site soils adjacent to one Baghouse Dust Collection Systems and Storage Area (SWMU 3). Additionally, evidence of a past release was noted at the Former Outside Hazardous Waste Storage Area (SWMU 8). The facility representatives could not provide any additional information on the past release at SWMU 8.

2.5 REGULATORY HISTORY

Johnson Controls submitted a Notification of Hazardous Waste Activity form to EPA on July 28, 1980 (Johnson Controls 1980a). Johnson Controls submitted a RCRA Part A permit application on November 19, 1980, stating that the facility was a large-quantity generator handling the following EPA hazardous waste codes: D002 and D008. The permit application states that the facility has a 331,200-gallon tank storage capacity and a 150-gallon storage (S02) capacity (Johnson Controls 1980b).

IEPA inspected the facility on February 2, 1982. During this inspection, IEPA made a preliminary determination that the facility did not fall under RCRA authority. The basis for IEPA's determination was (1) that the hazardous waste codes D002 and D008 were listed on Johnson's RCRA Part A permit application as a protective measure, possibly because of the potential for spills from the various manufacturing processes; (2) that all wastewater containing lead was being treated by the facility at the WWTP (SWMU 2); and (3) that the scrap lead and trash (D008) at the facility were potentially exempt under 40 CFR 261.6 and were being reclaimed by an off-site smelting company. On March 8, 1982, IEPA recommended that Johnson withdraw its RCRA Part A permit application (IEPA 1982).

IEPA did not inspect the facility between 1982 and 1987. On March 11 and March 30, 1988, IEPA conducted two RCRA compliance inspections of the facility. During these inspections, IEPA found that the facility was not labeling its hazardous containers, had inadequate personnel training records, and had insufficient aisle space between its hazardous waste containers (IEPA 1988).

On May 2, 1988, the facility submitted a request to IEPA that they consider the withdrawal of their RCRA Part A permit application. On July 1, 1991, IEPA responded to this request by denying Johnson's withdrawal request because the facility stored hazardous wastes in containers and tanks on site for periods greater than 90 days. Furthermore, IEPA determined that the facility was operating as a RCRA interim status storage facility. IEPA's denial was based on the review of hazardous waste manifests submitted to IEPA from 1985 through 1988 (IEPA 1991). Since 1988, IEPA has not conducted any RCRA inspections at the facility.

On November 16, 1993, the facility's environmental consultant, Baxter and Woodman, Inc. (Baxter and Woodman), submitted a closure plan for the 5,000-gallon WWTP (SWMU 2) sludge AST, which stored hazardous waste greater than 90 days (Baxter and Woodman 1993). IEPA has not responded to this request. This tank was removed by the facility in 1989. The facility has not requested the closure of the remaining SWMUs. The facility is currently regulated as a treatment, storage, or disposal (TSD) facility.

On February 28, 1992, IEPA reissued a permit to Johnson for operation of the facility's WWTP (SWMU 3) system. The permit number is 1990-EN-4863-2. The wastewater generated by this system is discharged to the City of Geneva's sewer system (IEPA 1992b).

The facility has one air operating permit for the operation of lead oxide baghouses and other air emission sources. These emission sources are permitted under Permit No. 089035AAF. The facility has no known air permit violations. The facility has no history of odor complaints or dust emissions from area residents.

2.6 ENVIRONMENTAL SETTING

This section describes the climate; flood plain and surface water; geology and soils; and groundwater in the vicinity of the facility.

2.6.1 Climate

The climate in Kane County is continental. The average daily temperature is 48.9 degrees Fahrenheit (°F). The lowest average daily temperature is 29.7 °F in January. The highest average daily temperature is 84.1 °F in July (USDA 1979).

The total annual precipitation for the county is 34.7 inches. The mean annual lake evaporation for the area is about 30 inches (USDOC 1968). The 1-year, 24-hour maximum rainfall is about 2.5 inches (USDOC 1963). The prevailing wind is from the west. Average wind speed is highest in March at 12 miles per hour (USDA 1979).

2.6.2 Flood Plain and Surface Water

The facility is not located in a 100- or 500-year flood plain or flood-prone area (FEMA 1981). The nearest surface water body, an unnamed pond, is located at the facility and is used for recreational and industrial purposes. The Fox River is located about 0.8 mile west of the facility. Surface water runoff at the facility flows south-southwest into the Fox River. The Fox River is used as a municipal water supply for Aurora, Illinois. Aurora's intakes are located about 13 miles downstream from Geneva (PRC 1993; USGS 1978; USGS 1980).

2.6.3 Geology and Soils

The surface soils around the facility are classified by the USDA as Milford silty clay loam. The surficial soil ranges in depth from 36 to 60 inches below ground surface (bgs) (USDA 1979).

Pleistocene glacial till underlies surficial soils. The till consists of layers of silt and sand to gravel. The glacial till is about 60 feet thick in the facility vicinity. Silurian system dolomites underlie the till and are about 150 feet thick. Ordovician-age formations underlie the dolomite. The uppermost Ordovician-age formation is the Maquoketa Group shale and dolomite, a continuing group that is about 95 feet thick. The Galena-Platteville Dolomite Groups underlie the Maquoketa Group and are about 335 feet thick. The Ancell Group, consisting of Glenwood and St. Peter sandstones, underlies the Galena-Platteville Dolomite Groups. The Ancell Group is about 475 feet thick. Five Cambrian-age sandstone formations, up to about 1,200 feet thick, underlie the Ancell Group. The sandstones are primarily dolomite, with some shale, and are underlain by Precambrian-age crystalline rocks (Waller and Sanderson 1978; USGS 1985).

2.6.4 Groundwater

Groundwater in the county is derived from four sources: (1) the shallow sand and gravel aquifer; (2) the Upper Bedrock Aquigroup; (3) the Midwest Aquigroup; and (4) the Basal Bedrock Aquigroup. The shallow sand and gravel aquifer of the glacial drift extends to about 60 feet bgs and can sustain some development of wells requiring about 100 to 500 gallons per minute (gpm) (ISGS 1966).

The Upper Bedrock Aquigroup is encountered at about 60 feet bgs and extends about 210 feet bgs (Waller and Sanderson 1978). This aquifer system consists of Silurian-age dolomite and shale and may yield up to 1,000 gpm, but yields are inconsistent because of cracks and fractures in the dolomites and shale. In some areas, a free exchange of water exists between the Upper Bedrock Aquigroup and the glacial drift above it (USGS 1985). Generally, this aquifer is highly fractured and transmissivity is highly variable, ranging from 10,500 gallons per day per foot (gpd/ft) to 85,400 gpd/ft (Visocky, Sherrill, and Cartwright 1985).

The Maquoketa shales act as a partial barrier to downward water movement; however, the Upper Bedrock Aquigroup shows some appreciable downward leakage to the deep bedrock system through the Maquoketa shales. The average vertical permeability of the Maquoketa shales is 5×10^{-5} gpd/square foot. These shales yield little or no water and are not considered a source for large-water supplies (USGS 1985).

The Midwest Aquigroup consists of Cambrian and Ordovician-age dolomite and sandstone groups interbedded with some shale. This aquifer system is encountered at about 210 feet bgs and extends to about 1,100 feet bgs (Waller and Sanderson 1978). Wells in this aquifer system yield about 700 gpm. Regional transmissivity values generally range between 10,000 gpd/ft and 20,000 gpd/ft (USGS 1985).

The Basal Bedrock Aquigroup is a Cambrian-age aquifer system consisting of shale, siltstone, and sandstone. This aquigroup underlies the Midwest Aquigroup and extends from about 1,100 feet bgs to about 2,200 feet bgs (Waller and Sanderson 1978). Transmissivity values range between 23,300 to 27,000 gpd/ft (USGS 1985).

The facility area is serviced by municipal water drawn from six City of Geneva wells. The closest municipal well is about 0.5 mile north of the facility. The next closest city well is about 0.8 mile west-southwest of the facility. Another well is about 1.2 miles southwest of the facility. The three remaining municipal wells are about 1.1, 1.6, and 1.9 miles northwest of the facility. All six municipal wells are upgradient of the facility. Five of the city wells draw water from the Midwest Aquigroup, which is about 1,100 feet bgs. The sixth city well draws water from the sand and gravel aquifer (PRC 1993). Groundwater in the area generally moves to the southeast (USGS 1985).

Geneva has no known private, industrial or residential wells (PRC 1993). No downgradient wells are known to be located within 3 miles of the facility.

2.7 RECEPTORS

The facility occupies 16.5 acres in a mixed-use area in Geneva, Illinois. Geneva has a population of about 12,700 (Rand McNally and Company 1993).

The facility is bordered on the north by E and T Glass and Mirror, Inc., a vacant lot, and Allied Tubular Rivet, Inc., all located on Commerce Drive; on the west by a residential subdivision; on the south by railroad tracks and Waste Management, Inc.'s, Settler's Hill landfill; and on the east by Miner Enterprises, Inc., a railroad equipment manufacturer. The nearest residential area is located less than 0.1 mile west of the facility. The nearest school, Harrison Street School, is about 0.5 mile northwest of the facility. Facility access is restricted by a barbed wire fence, which surrounds the facility.

The nearest surface water body, an unnamed pond, is located on site at the facility and is used for recreational and industrial purposes. Other surface water bodies in the area include the Fox River, which is about 0.8 mile west of the facility. The Fox River is used as a water supply for Aurora, Illinois. Aurora's intakes are located about 13 miles downstream from Geneva.

The facility area is serviced by municipal water drawn from six City of Geneva wells. The closest municipal well is about 0.5 mile north of the facility. The next closest city well is about 0.8 mile west-southwest of the facility. Another well is about 1.2 miles southwest of the facility. The three remaining municipal wells are about 1.1, 1.6, and 1.9 miles northwest of the facility. All six wells are upgradient of the facility. Groundwater in the area generally moves to the southeast (USGS 1985). Geneva has no known private industrial or residential wells (PRC 1993). No downgradient wells are known to be located within 3.0 miles of the facility.

Sensitive environments are located both on site and east of the facility's manufacturing activities. A palustrine, unconsolidated bottom, intermittently exposed wetland pond is located on site. Other sensitive environments include various palustrine wetlands, which are from 0.1 mile to 2.0 miles east

to southeast of the facility. Additionally, one palustrine, forested and emergent wetland area is located on the Fox River and is about 1.6 miles southwest of the facility (NWI 1984). Fabyan Forest Preserve, a Kane County preserve, is about 0.9 mile south-southwest of the facility.

3.0 SOLID WASTE MANAGEMENT UNITS

This section describes the nine SWMUs identified during the PA/VSI. The following information is presented for each SWMU: description of the unit, dates of operation, wastes managed, release controls, history of documented releases, and PRC's observations. Figure 2 shows the SWMU locations.

SWMU 1 **Hazardous Waste Storage Area**

Unit Description: This unit is located indoors and aboveground. The unit covers an area of about 15 by 25 feet. The unit consists of an epoxy-sealed concrete floor. No floor drains are present. This unit manages wastes in drums stored on top of wooden pallets.

Date of Startup: This unit began operation in October 1993.

Date of Closure: This unit is active.

Wastes Managed: The unit manages spent carburetor cleaner (F001 and D008), spent acetic acid (D002, D007, and D008), spent COS flux (D002, D004, D007, and D008), spent hydrobromic acid and ethylene glycol (D002 and D008), and used oil (D008). All waste stored at this unit is stored in drums.

Release Controls: The unit's only release control is an epoxy-sealed concrete floor. The unit is indoors and no floor drains are located in the area.

History of Documented Releases: No releases from this unit have been documented.

Observations: During the VSI, the unit contained three 55-gallon drums of spent acetic acid (D002, D007, and D008), one 55-gallon drum of spent COS flux (D002, D004, D007, and D008), one 55-gallon drum of spent carburetor cleaner (F001 and D008), two 55-gallon drums of used oil (D008), one 30-gallon drum of spent carburetor cleaner (F001 and D008), and one 55-gallon drum of spent hydrobromic acid solution and ethylene glycol (D002 and D008). All drums were closed with no visible leaks or cracks. No cracks were present on the unit's concrete floor. PRC noted no evidence of release (see Photograph No. 4).

SWMU 2 **Wastewater Treatment Plant (WWTP)**

Unit Description: This unit is located indoors and aboveground. The unit covers an area of about 60 by 60 feet. The unit consists of an epoxy-sealed concrete floor, wastewater sump collection pit, neutralization tank, eight fiberglass tanks of sulfuric acid, settling tank clarifier, switch controls, sludge press and conveyor, two drums of WWTP sludge, and an open, grated trough that leads to the sump pit. A former 5,000-gallon AST, which was removed in 1989, was used to dewater and store WWTP sludge (D008).

Date of Startup: This unit began operation in 1977.

Date of Closure: This unit is active. The former 5,000-gallon AST was removed in 1989 and is undergoing RCRA closure. The AST closure plan was submitted by the facility to IEPA in November 1993.

Wastes Managed: This unit has always treated and managed, in bulk, spent sulfuric acid (D002 and D008), and process wastewater (D002 and D008). Prior to 1992, this unit managed the WWTP sludge and the WWTP filter cake as D008 hazardous wastes. The generation of the WWTP sludge

(D008) was discontinued by the facility at the end of 1991 when the 5,000-gallon aboveground storage tank used to store the sludge was deactivated. After 1991, the facility stopped managing the filter cake as a RCRA hazardous waste because the waste was sent off site to a recycling facility for recovery. At the time of the VSI, the facility claimed that lead-bearing wastes sent off site for recycling and returned as lead ingots were not considered RCRA hazardous wastes. Johnson could not provide documentation to support this claim.

Release Controls: The unit's release controls include an epoxy-sealed concrete floor, concrete masonry walls, enclosed roof, sump collection area, and constant effluent monitoring before discharge to the City of Geneva's sanitary sewer system.

History of Documented Releases: No releases from this unit have been documented.

Observations: During the VSI, facility process wastewater (D002 and D008), which was pumped from the sump pit, was being treated at the WWTP. Two drums of WWTP filter cake were present. No cracks, stains, or floor drains were present on the concrete floor. PRC noted no evidence of release (see Photograph No. 11).

SWMU 3 **Baghouse Dust Collection Systems and Storage Areas**

Unit Description: The areas associated with this unit are located throughout the facility at outdoors and indoors locations. All units are aboveground. They vary in size from 6 by 6 feet to 50 by 10 feet. A total of about 11 baghouse dust units are located throughout the manufacturing area of the facility. The dust is collected in the baghouse by vacuum pressure and then is collected using gravity at the bottom of each unit. Each unit consists of an unsealed concrete pad below each baghouse

	collection system; metal and cloth collection systems; and a 30-gallon metal drum which is sealed to the individual baghouse and is situated directly below each baghouse dust collection system.
Date of Startup:	This unit began operation in about 1961.
Date of Closure:	This unit is active.
Wastes Managed:	This unit has always managed baghouse dust. At the time of the VSI, the facility claimed that lead bearing baghouse dust sent off site for recycling and returned as lead ingots were not considered RCRA hazardous wastes. Johnson could not provide documentation to support this claim.
Release Controls:	The only release control associated with this unit is an unsealed concrete pad.
History of Documented Releases:	No releases from this unit have been documented.
Observations:	During the VSI, a documented release of baghouse dust to on-site soil adjacent to one of the unit areas was observed. PRC noted that the size of the release was about 4 by 5 feet. The drums in this unit were not labeled by the facility. Cracks were observed on the concrete pad (see Photograph No. 8).
SWMU 4	**Drum Accumulation Areas**
Unit Description:	The areas associated with this unit are located indoors and aboveground. About 75 Drum Accumulation Areas are present at the facility. One or two drums of lead dross and lead debris and floor sweepings are accumulating at each area. Each area typically covers

	an area of 4 by 4 feet; however, the exact dimensions of all the areas are unknown.
Date of Startup:	This unit began operation in about 1980.
Date of Closure:	The unit areas are active.
Wastes Managed:	The unit has always managed lead dross and lead debris and floor sweepings. The lead dross and the lead debris and floor sweepings have always been recycled.
Release Controls:	The units only release control is a sealed concrete floor.
History of Documented Releases:	No release from this unit has been documented.
Observations:	During the VSI, each unit contained one to three sealed drums of lead dross or lead debris and floor sweepings. No cracks or floor drains were observed on the concrete floor. The drums in this unit were not labeled by the facility. PRC noted no evidence of release at any of the areas associated with this unit (see Photographs No. 1, 2, and 5).
SWMU 5	**Clean Water Treatment System**
Unit Description:	The unit is located indoors and aboveground. The unit covers an area of about 25 by 40 feet. This unit treats the lead paste wash water from the facility's high speed grid lead pasting operation, which is adjacent to this unit. This unit uses polymers, a mixing tank, a sludge press, and a settler/clarifier to remove lead from the lead paste wash water. The treated water is then recycled back through the lead pasting operation or discharged to the WWTP (SWMU 2). The

	sludge press produces a clean water treatment sludge, which is stored in drums at this unit.
Date of Startup:	This unit began operation in about 1980.
Date of Closure:	This unit is active.
Wastes Managed:	This unit has always treated lead paste wash water from the high-speed lead pasting operation and has always managed clean water treatment sludge.
Release Controls:	The unit has an epoxy-sealed concrete floor with a 4-inch concrete secondary containment berm surrounding the unit.
History of Documented Releases:	No releases from this unit have been documented.
Observations:	During the VSI, the unit contained two open-top 55-gallon drums of clean water treatment sludge and the treatment system was in operation. The drums in this unit were not labeled by the facility. A gray stain covered various areas and equipment within the unit. No cracks or floor drains were observed on the concrete floor (see Photograph No. 6).
SWMU 6	**Lead Scrap Storage Area**
Unit Description:	The unit is located indoors and aboveground. The unit has an area of about 60 by 20 feet. The unit consists of an epoxy-sealed concrete floor. No floor drains are present. All waste is stored in drums and double stacked at this unit. The unit is used about twice per year during the cleanout of all Drum Accumulation Areas (SWMU 4). Drums from SWMU 4 are stored less than 90-days at this unit prior to

	off-site shipment for recycling or storage in SWMUs 2 through 5 or 7.
Date of Startup:	This unit began operation in about 1992.
Date of Closure:	This unit is active.
Wastes Managed:	This unit has always managed baghouse dust, lead dross, lead debris and floor sweepings, and clean water treatment sludge, and WWTP filter cake.
Release Controls:	This unit's only release control is an epoxy-sealed concrete floor.
History of Documented Releases:	No releases from this unit have been documented.
Observations:	During the VSI, the unit contained about 200 55-gallon drums of lead bearing wastes including baghouse dust, lead dross, lead debris and floor sweepings, clean water treatment sludge, and WWTP filter cake. The drums in this unit were not labeled by the facility. No cracks or stains were visible on the concrete floor. PRC noted no evidence of release (see Photograph No. 3).
SWMU 7	**Lead Scrap Trailer Storage Area**
Unit Description:	The unit is located outdoors and aboveground. The unit is an enclosed semi trailer, which has a 40 by 10 feet dimension. The unit is stored next to the northeast truck dock. Drums of waste are stored in closed containers on wooden pallets inside the trailer. An unsealed concrete pad underlies the trailer. When the trailer is full of 55-gallon drums, it is transported off site and a new, empty trailer is moved into

	this unit. A floor drain is present below the trailer on the concrete pad.
Date of Startup:	This unit began operation in about 1961.
Date of Closure:	This unit is active.
Wastes Managed:	This unit has always managed baghouse dust, lead dross, lead debris and floor sweepings; clean water treatment sludge; and WWTP filter cake.
Release Controls:	The unit manages waste in closed containers inside a trailer. An unsealed concrete pad is located under the trailer.
History of Documented Releases:	No releases from this unit have been documented.
Observations:	During the VSI, the unit contained about 24 55-gallon drums of lead dross, lead debris and floor sweepings, clean water treatment sludge, and WWTP filter cake. PRC noted no evidence of release (see Photograph No. 7).
SWMU 8	**Former Outside Hazardous Waste Storage Area**
Unit Description:	The unit is located outdoors and aboveground. The unit was about 20 by 30 feet in area. The unit consisted of an unsealed asphalt pad with no secondary containment. An unsealed gravel and dirt area is immediately west and adjacent to the former unit. This unit was used to store hazardous waste for greater than 90 days in 55-gallon drums.
Date of Startup:	The unit began operation in about 1980.

Date of Closure:	This unit is inactive. The facility stopped using this unit in October 1993. No RCRA clean closure plan has been submitted for this unit.
Wastes Managed:	This unit managed waste naphtha solvent (D001), spent carburetor cleaner (F001, D004, D007, and D008), spent acetic acid (D002, D007, and D008), spent COS flux (D002 and D008), and used oil (D008).
Release Controls:	The only release control is an unsealed asphalt-paved pad.
History of Documented Releases:	No releases from this unit have been documented.
Observations:	During the VSI, no wastes were stored at this unit. The asphalt pad was stained red. No berm or secondary containment surrounded the unit. No cracks in the asphalt were observed (see Photograph No. 10).

SWMU 9 **Used Oil Storage Area**

Unit Description:	The unit is outdoors and aboveground adjacent to the facility's garage. The unit consists of two 275-gallon, steel ASTs. The unit covers an area of about 6 by 4 feet. An unsealed concrete floor underlies the ASTs, and a gravel parking lot is immediately adjacent to this pad.
Date of Startup:	This unit began operation before 1980. The age of the ASTs is unknown.
Date of Closure:	This unit is active.
Wastes Managed:	This unit manages used oil (nonhazardous).

Release Controls:	The unit's only release control is an unsealed, unbermed concrete pad.
History of Documented Releases:	No releases from this unit have been documented.
Observations:	During the VSI, the unit contained two 275-gallon ASTs, which were partially full. The only secondary containment is an unsealed, unbermed concrete pad. No cracks in the concrete below the unit were observed. PRC noted no evidence of release (see Photograph No. 15).

4.0 AREAS OF CONCERN

PRC identified three AOCs during the PA/VSI. These AOCs are discussed below; their locations are shown in Figure 2.

AOC 1 Former Diesel Underground Storage Tank (UST)

This steel UST was installed in May 1978. Its capacity was 8,000 gallons (Johnson 1993a and 1993b). The UST was removed by the facility in October 1993. In the process of removing this UST, the facility's UST removal contractor noted that the soil around the UST exhibited visible signs of petroleum contamination. The facility indicated that the contamination was the result of overfilling the UST with diesel fuel. The tank had been pressure tested once per year after 1988. In October 1993, Johnson notified the State of Illinois Emergency Management Agency (IEMA) of the petroleum contamination present in on-site soils. No analytical results are available for the petroleum-contaminated soil. No soils were excavated when the UST was removed (see Photograph No. 12).

AOC 2 Former Gasoline UST

It is unknown when this UST was installed. This 550-gallon capacity UST was removed by the facility in May 1988. During the removal of the UST, the facility's UST removal contractor determined that the UST leaked and that the soil was visibly contaminated by gasoline. No known analytical data exists to demonstrate the level of contamination present in the soil. IEMA was notified of the leak in October 1993 (Johnson 1993a and 1993b). No soils were excavated when the UST was removed (see Photographs No. 13 and 14).

AOC 3 Former Fuel Oil UST

According to facility representatives, the age and location of this UST is unknown. This 8,000-gallon UST was used to store fuel oil. The UST was filled with gravel

and abandoned in place by the facility prior to 1987 (Johnson 1993a). No other information on this UST exists in EPA, state or facility files.

5.0 CONCLUSIONS AND RECOMMENDATIONS

The PA/VSI identified nine SWMUs and three AOCs at the Johnson facility. Background information on the facility's location; operations; waste generating processes and waste management practices; history of documented releases; regulatory history; environmental setting; and receptors is presented in Section 2.0. SWMU-specific information, such as the unit's description, dates of operation, wastes managed, release controls, history of documented releases, and observed condition, is presented in Section 3.0. AOCs are discussed in Section 4.0. Following are PRC's conclusions and recommendations for each SWMU and AOC. Table 3, located at the end of this section, summarizes the SWMUs and AOCs at the facility and the recommended further actions.

SWMU 1 **Hazardous Waste Storage Area**

Conclusions: The unit manages spent carburetor cleaner (F001 and D008), spent acetic acid (D002, D007, and D008), spent COS flux (D002, D004, D007, and D008), spent hydrobromic acid and ethylene glycol (D002 and D008), and used oil (nonhazardous). This unit has been used to store hazardous wastes in drums since October 1993. The unit has a low potential for release to groundwater, surface water, air, and on-site soils because the unit is indoors; it has a sealed concrete floor; no visible stains were observed during the VSI; and no releases from this unit have been documented.

Recommendations: PRC recommends no further action for this SWMU at this time.

SWMU 2 **Wastewater Treatment Plant (WWTP)**

Conclusions: This unit has always managed, in bulk, spent sulfuric acid (D002 and D008), process wastewater (D002 and D008). Prior to 1992, this unit has managed the WWTP sludge and the WWTP filter cake as D008 hazardous wastes. The generation of the WWTP sludge (D008) was discontinued by the facility by the end of 1991. Since 1991, the facility has not managed this waste as a RCRA hazardous waste. At the time of the VSI, the facility claimed that

lead-bearing wastes sent off site for recycling and returned as lead ingots were not considered RCRA hazardous wastes. Johnson could not provide documentation to support this claim. This unit is used to treat the process wastewater and sulfuric acid generated from the battery production operations. WWTP sludge is generated from this operation and is stored in this unit. The unit has a low potential for release to groundwater, surface water, air, and on-site soils because the unit is indoors; it has a sealed concrete floor and concrete masonry walls; all wastewater entering the WWTP is treated and neutralized on site and then discharged to the City of Geneva's sanitary sewer system; and no releases from this unit have been documented.

Recommendations: PRC recommends no further action for this SWMU at this time.

SWMU 3 **Baghouse Dust Collection Systems and Storage Areas**

Conclusions: This unit consists of numerous baghouse dust collectors and drums located throughout the facility. This unit manages baghouse dust. Sealed 30-gallon metal drums are situated directly below each collection system. During the VSI, the unit had a documented release to soil. The potential for release is high to surface water, air, and on-site soils because the unit areas are outdoors; they are not adequately contained to prevent a release; cracks in the concrete pad beneath one of the areas was visible; and one of the areas had released baghouse dust to adjacent soils. The potential for release to groundwater is moderate because only the surface soil was found to have a documented release, the release covers only a small area (less than 25 square feet), and no known releases to groundwater have been documented.

Recommendations: PRC recommends that the facility take corrective measures to prevent the release of baghouse dust including installing secondary containment, sealing the concrete pads adjacent to the unit areas, removing/remediating contaminated soil, and conducting weekly inspections of each system area.

SWMU 4 **Drum Accumulation Areas**

Conclusions: About 75 Drum Accumulation Areas are present at the facility. Lead dross and lead debris and sweepings are stored at each unit area. The unit has a low potential for release to groundwater, surface water, air, and on-site soils because the unit is indoors; the unit has sealed concrete floors; no floor drains are present; wastes are stored in drums; and no releases from this unit have been documented.

Recommendations: PRC recommends no further action for this SWMU at this time.

SWMU 5 **Clean Water Treatment System**

Conclusions: This unit is used to treat lead paste wash water generated by the facility's high-speed lead pasting operation. During the VSI, the drums of clean water treatment sludge present at the unit were stored open. The unit has a low potential for release to groundwater, surface water, air, and on-site soils because the unit is indoors; no floor drains are present; it has a sealed concrete floor; it has a 4-inch concrete secondary containment berm surrounding the unit; and no releases from this unit have been documented.

Recommendations: PRC recommends that drums containing sludge be stored closed.

SWMU 6 **Lead Scrap Storage Area**

Conclusions: This unit is used about twice per year to store baghouse dusts, lead dross, lead debris and floor sweepings; clean water treatment sludge ; and WWTP filter cake aggregated from the WWTP (SWMU2), the Baghouse Dust Collection Systems and Storage Areas (SWMU 3), the Drum Accumulation Areas (SWMU 4), and the Clean Water Treatment Area (SWMU 5). This unit has a low potential for release to groundwater, surface water, air, and on-site soils because the unit is indoors; no floor drains are present; it is on a sealed

concrete floor; it is used temporarily about twice per year; it manages waste in closed drums; and no releases from this unit have been documented.

Recommendations: PRC recommends no further action for this SWMU at this time.

SWMU 7 **Lead Scrap Trailer Storage Area**

Conclusions: This unit has been used to store 55-gallon drums of waste including baghouse dusts, lead dross, lead debris and floor sweepings, clean water treatment sludge, and WWTP filter cake for less than 90 days. The facility has not managed these wastes as a hazardous waste. At the time of the VSI, the facility claimed that lead-bearing wastes sent off site for recycling and returned as lead ingots were not considered RCRA hazardous wastes. Johnson could not provide documentation to support this claim.

Recommendations: PRC recommends no further action for this SWMU at this time.

SWMU 8 **Former Outside Hazardous Waste Storage Area**

Conclusions: Prior to 1992, this unit managed waste naphtha solvent (D001), spent carburetor cleaner (F001, D004, D007, and D008), spent acetic acid (D002, D007, and D008), spent COS flux (D002 and D008), and used oil (D008). This unit was used to store hazardous waste in closed containers on an asphalt pad, which had no secondary containment. Additionally, during the VSI a red stain was present on the asphalt pad. When active, the unit had a moderate potential for release to groundwater, surface water, air, and on-site soils because the unit was outdoors; it consisted of an unsealed asphalt pad with no secondary containment; an unsealed gravel and dirt area is immediately west and adjacent to the former unit; and a release from this unit was documented.

Recommendations: PRC recommends that this unit undergo RCRA closure.

SWMU 9 **Used Oil Storage Area**

Conclusions: This unit is used to store used oil (nonhazardous) in two 275-gallon aboveground storage tanks. The unit has a moderate potential for release to groundwater, surface water, air, and on-site soils because the unit is outside; the concrete pad is unsealed; no secondary containment exists to contain potential spills; and a gravel parking lot is immediately adjacent to this unit.

Recommendations: PRC recommends that the facility construct a secondary containment berm around the unit to contain spills to comply with EPAs 40 Code of Federal Regulations Part 279 and the state of Illinois used oil management standards.

AOC 1 **Former Diesel Underground Storage Tank (UST)**

Conclusions: This AOC has a documented release of diesel fuel to on-site soils. This UST was installed in May 1978 and removed in October 1993. This AOC has an unknown potential for release to groundwater, surface water, air, and on-site soils because the unit was outdoors, below ground, no soils were excavated when the UST was removed, and known releases to on-site soils have occurred, however the extent of diesel fuel contamination is unknown.

Recommendations: PRC recommends that the facility sample soils to delineate the current extent of contamination. Based on the soil data, the analytical results may warrant the installation of groundwater monitoring wells upgradient and downgradient of the AOC.

AOC 2 **Former Gasoline UST**

Conclusions: This AOC had a documented release of gasoline to on-site soils. The age of this UST is unknown and was removed in May 1988. This AOC has an unknown potential for release to groundwater, surface water, air, and on-site soils because the unit was outdoors, below ground, no soils were excavated

when the UST was removed, and known releases to on-site soils have occurred, however the extent of gasoline contamination is unknown.

Recommendations: PRC recommends that the facility sample soils to delineate the current extent of contamination. Based on the soil data, the analytical results may warrant the installation of groundwater monitoring wells upgradient and downgradient of the AOC.

AOC 3 **Former Fuel Oil UST**

Conclusions: The location of this AOC is unknown. The AOC was abandoned in place and filled in with gravel prior to 1987. No other information about this AOC exists in EPA, state, or facility files. This AOC has an unknown potential for release to groundwater, surface water, air, and on-site soils because the AOC was outdoors and below ground; the AOC was not removed and was filled in with gravel; the level of contamination is unknown; and the location of the AOC is unknown.

Recommendations: PRC recommends that the facility determine the location of this AOC and collect on site soil samples to determine if a release has occurred. If soil contamination is detected, groundwater sampling may be warranted.

TABLE 3

SWMU AND AOC SUMMARY

SWMU	Dates of Operation	Evidence of Release	Recommended Further Action
1. Hazardous Waste Storage Area	October 1993 to present	None	No further action
2. WWTP	1977 to present	None	Characterize wastes sent off site for reclamation
3. Baghouse Dust Collection Systems and Storage Areas	About 1961 to present	Yes	Prevent further releases of baghouse dust by installing secondary containment, seal the concrete pads, remove/remediate soil contaminated with dust, conduct weekly inspections, and characterize waste currently sent off site for reclamation
4. Drum Accumulation Areas	About 1980 to present	None	Characterize wastes currently sent off site for reclamation
5. Clean Water Treatment System	About 1980 to present	None	Store sludge in closed drums and characterize wastes currently sent off site for reclamation
6. Lead Scrap Storage Area	About 1992 to present	None	Characterize wastes currently sent off site for reclamation
7. Lead Scrap Trailer Storage Area	About 1961 to present	None	Characterize wastes currently sent off site for reclamation

TABLE 3 (continued)

SWMU AND AOC SUMMARY

SWMU	Dates of Operation	Evidence of Release	Recommended Further Action
8. Former Outside Hazardous Waste Storage Area	About 1980 to October 1993	Yes	Have this unit undergo RCRA closure
9. Used Oil Storage Area	Before 1980 to present	None	Construct a secondary containment berm around the unit

AOC	Dates of Operation	Evidence of Release	Recommended Further Action
1. Former Diesel Underground Storage Tank (UST)	May 1978 to October 1993	Yes	Sample soils to delineate the extent of contamination. Based on soil data, the analytical results may warrant the installation of groundwater monitoring wells upgradient and downgradient of the AOC
2. Former Gasoline UST	Unknown to May 1988	Yes	Sample soils to delineate the extent of contamination. Based on soil data, the analytical results may warrant the installation of groundwater monitoring wells upgradient and downgradient of the AOC

TABLE 3 (continued)

SWMU AND AOC SUMMARY

AOC	Dates of Operation	Evidence of Release	Recommended Further Action
3. Former Fuel Oil UST	Unknown to before 1987	Unknown	Determine the location of the AOC and collect soil samples to determine if a release has occurred. If soil contamination is detected, groundwater sampling may be warranted

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APPENDIX A

VISUAL SITE INSPECTION SUMMARY AND PHOTOGRAPHS

(Ten Pages)

VISUAL SITE INSPECTION SUMMARY

Johnson Controls, Inc., Battery Group
300 South Glengarry Drive
Geneva, Illinois
ILD 980 502 470

Date:	December 17, 1993
Primary Facility Representative:	Patrick Talano, Process Engineer
Representative Telephone No.:	(708) 232-4270
Additional Facility Representatives:	Bradley M. Fearnley, Manager, Engineering Jordan Harwood, Manager, Environmental Control
Inspection Team:	Kurt Whitman, PRC Environmental Management, Inc. (PRC) Keith Foszcz, PRC
Photographer:	Kurt Whitman, PRC
Weather Conditions:	Overcast, heavy fog and rain; temperature about 35 °F
Summary of Activities:	The visual site inspection (VSI) began at 9:00 a.m. with an introductory meeting. The inspection team explained the purpose of the VSI and the agenda for the visit. Facility representatives then discussed the facility's past and current operations, solid wastes generated, and release history. Facility representatives provided the inspection team with copies of requested documents. The VSI tour began at 10:25 a.m. PRC visited all areas, SWMUs, and operations within the facility. PRC inspected the following areas: (1) the Hazardous Waste Storage Area (SWMU 1); (2) the Wastewater Treatment Plant (WWTP) (SWMU 2); (3) the Baghouse Dust Collection Systems and Storage Areas (SWMU 3); (4) the Drum Accumulation Areas (SWMU 4); (5) the Clean Water Treatment System (SWMU 5); (6) the Lead Scrap Storage Area (SWMU 6); (7) the Lead Scrap Trailer Storage Area (SWMU 7); (8) the Former Outside Hazardous Waste Storage Area (SWMU 8); (9) the Used Oil Storage Area (SWMU 9); (10) the Former Diesel Underground Storage Tank (UST) (AOC 1); (11) the Former Gasoline UST (AOC 2); and the Former Fuel Oil UST (AOC 3).

The tour concluded at 12:17 p.m., after which the inspection team held an exit meeting with facility representatives. The VSI was completed and the inspection team left the facility at 12:28 p.m.

Photograph No. 1 Location: SWMU 4
Orientation: North Date: December 17, 1993
Description: This is a photograph of a Drum Accumulation Area.

Photograph No. 2 Location: SWMU 4
Orientation: North Date: December 17, 1993
Description: This is a photograph of a Drum Accumulation Area.

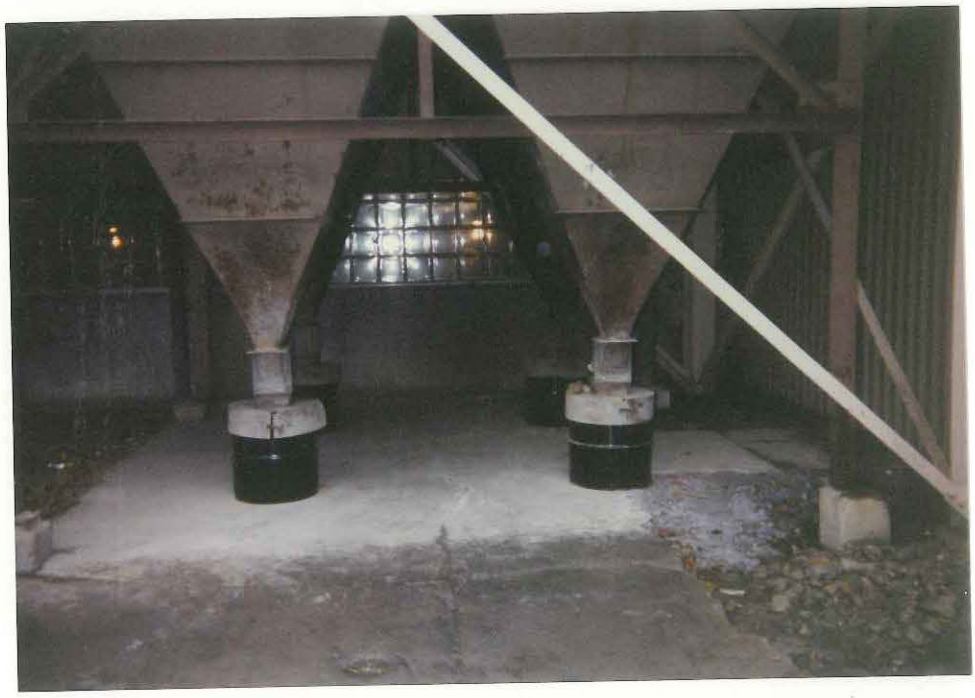
Photograph No. 3 Location: SWMU 6
Orientation: Northwest Date: December 17, 1993
Description: This is a photograph of the Lead Scrap Storage Area.

Photograph No. 4 Location: SWMU 1
Orientation: Southwest Date: December 17, 1993
Description: This is a photograph of the Hazardous Waste Storage Area.

Photograph No. 5 Location: SWMU 4
Orientation: North Date: December 17, 1993
Description: This is a photograph of a Drum Accumulation Area.

Photograph No. 6 Location: SWMU 5
Orientation: North Date: December 17, 1993
Description: This is a photograph of the Clean Water Treatment System and two drums stored within this unit.

Photograph No. 7 Location: SWMU 7
Orientation: North-Northeast Date: December 17, 1993
Description: This is a photograph of the Lead Scrap Trailer Storage Area.



Photograph No. 8 Location: SWMU 3
Orientation: South Date: December 17, 1993
Description: This is a photograph of a Baghouse Dust Collection System and Storage Area.

Photograph No. 9 Location: 100 feet east of SWMU 8
Orientation: Southwest Date: December 17, 1993
Description: This is a photograph of an area used to store empty 55-gallon drums.

Photograph No. 10 Location: SWMU 8
Orientation: West-Southwest Date: December 17, 1993
Description: This is a photograph of the Former Outside Hazardous Waste Storage Area.

Photograph No. 11 Location: SWMU 2
Orientation: South-Southwest Date: December 17, 1993
Description: This is a photograph of the Wastewater Treatment Plant.

Photograph No. 12 Location: AOC 1
Orientation: South-Southwest Date: December 17, 1993
Description: This is a photograph of the former location of the Former Diesel Underground Storage Tank (UST).

Photograph No. 13 Location: AOC 2
Orientation: Northwest Date: December 17, 1993
Description: This is a photograph of the former location of the Former Gasoline UST.

Photograph No. 14 Location: AOC 2
Orientation: Northwest Date: December 17, 1993
Description: This is a photograph of the former location of the Former Gasoline UST.

Photograph No. 15 Location: SWMU 9
Orientation: Southwest Date: December 17, 1993
Description: This is a photograph of the Used Oil Storage Area.

APPENDIX B

VISUAL SITE INSPECTION FIELD NOTES

(Eighteen Sheets)

All acid is recycled or it goes thru the WWTP operation.
Some of the ballasts go thru a "Rock & Dump" where the acid is dumped out.

0930 hrs. No wastestream are produced from the PbO production are recycled. The lead paste not used is recycled thru an off site smelter.
Unused grids are sent off-site for reclamation (no paste).
Floor sweepings & baghouse dust & WWTP & PPE all goes to the smelter. All waste is sent to 1 of 3 smelters.
Doe Run Inc. - Boss, MO
Golden Smelting - Eyam, MN
RSR Inc. - Indianapolis, IN

KEW 12/17/93

Hydrobromic acid aq. solution is sent off site to the smelters or to Clean Harbors, Inc.
HBr is used in etching of straps. It is called a COS Flux
25 gallons/week is generated.
All leaded waste generated about 5 drums of WWTP/week.
About 100 drums of leaded waste are generated plus 20 drums per month of lead dross.
Lead dross comes from strip & grid casting & COS. Dross is the skimmings (oxidation product) from the top of the melting pot. Some lead refractory lining waste is generated. Come from rebuilding the pots (non asbestos.
160 drums of waste/week are sent

KEW 12/17/93

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KEW 12/17/93

to the Smelter. All recycled
leaded waste is sent to smelters
and purchased back. All plastic
is sent to smelters. All poly
plastic is sent to another Johnson
plant for production of casings.
Have a lab facility for QC.
Surface water flows southward.
Very few inspections by IEPA for
waste section.

0458 No NPDES Permit.
All discharge to city of Geneva
Start date was 1961
Globe Union started operation
of facility. Johnson bought
Globe Union.
In 1990 Johnson incorporated
the facility & formed a wholly-
owned subsidiary and is now
KEW 12/17/93

called Johnson Controls Battery
Group, Inc. (12/31/93)
Others: Controls
AIA. System
Plastic Tech
Battery Group
One air permit
No known air violations or
complaints from residents.
Number of employees is 340
with 3 shifts.
Total acres is 16.5.
Facility is fenced all the
way around. Locked doors
& Security guard & fencing.
Acid is received in 5,000 gallon
bulk storage. Stored in
AST. 30% NaOH solution
is brought in bulk & stored in AST.
KEW 12/17/93

Flux & epoxy recovered in drums.
From the maintenance shop they generate
Used oil. Not sure who picks up oil
Facility has parts washer.
Containing mineral spirits. One
on site. Managed by Safety
Kleen.
Former DSA is a concrete
pad. No other release controls.
Only MT drums stored at
this location. No waste was
stored here. MT drums (clean)
only.
Recyclable by-product

Two years process & sanitary were
by passed. Process wastewater
is rinsewater + blowdown from
parts washer + overflow from
KEW 12/17/93

Cooling tower & makeup water.
15,000 gallons per day.
Neutralization, flocculation, coagulation
& sedimentation + filter press for
sludge. Lamella clarifier
Lime, Ferrous Sulfate + polymer.
40' x 50'. Built in 1977.
1014 hrs Discussed history of spills.
All floor drains go to the WWTP.
1022 hrs End discussion of
process wastes.
1027 hrs 10,500 [illegible] bathtubs/
day are produced.
Scrap bathtubs are recycled
in site + off site
1031 hrs Parts Washer in
maintenance shop. Concrete
floor, epoxy sealed. No
ventilation. No sign of spills
or staining. All mineral spirits used

KEW 12/17/93

is mixed with used oils &
goes to Clean Harbors. 10 gallons
per year.
1038 hrs Photograph 1 (north)
photo of lead dross storage area
from molding for operation.
Concrete floor - epoxy; no visible
spills or cracks in concrete
floor sweepings behind it -
2 drums of lead dross. Some
smaller batches are built into
production. The lead to
large oven outside by
molding operation.
1.043 hrs Photograph 2 (north) of
1 drum of lead dross from
grid casting.
Lead contains antimony
(~1.75% antimony) & calcium
KEW (12/17/93)

alloy based lead. Floor drains
present - No sign of
spills except around the
drum of lead dross - Swept
up daily. Epoxy lined
concrete floor. All
parts greased.
1046 hrs Photograph 3 (northwest)
photo of lead scrap.
About 200 55-gal drums
are temporarily stored here.
Stored here a couple of times
per year.
1050 hrs Photograph 4 (southwest)
of Drum Storage Area (Hazardous Waste)
3 drums solder and 1 lead (D002, D007, D008)
1 drum flux (COS) (D002
D006, D007, D008)
KEW 12/17/93 1 drum paint related (carb cleaner)

1 drum methylene chloride
(F001 & D008) 30 gal DF
& 1 drum HBR solution &
ethylene glycol
No visible spills in concrete.
No cracks in epoxy lined
concrete, No fire suppression
Drums are stacked on secondary
containment pads (used for
leaks)
1057 hrs Photograph 5 (north)
Photo of the 1 Porcelane
(wet scrubber) from the
ventilation of 2 mixer
operations. Orange dust
present on the floor. Concrete
epoxy lined floor. Spillage
present! No cracks in the
concrete. This immediately north of
the inside Haz. Waste Storage Area | KEW 12/17/93

Porcelane stored in
early 1980's.
DSA was stored in
October 1993. Waste
was previously stored outside.
1103 hrs. Photograph 6 (north)
Photo of Clearwater
system - Removes lead
paste from high speed
pasting operation. Pumped
from sump system which
collects paste & is
pumped here. Use
filter press. From
here water is reused
/ recycled. Sludge goes
to smelter. Separate from
other WWTP operation.

KEW 12/17/93

1109 hrs Photograph 7 (north-northwest) Photo of lead scrap stored on 40' trailer which go to smelter. On truck dock, Floor drain below truck dock. Goes to storm sewer. Haz. waste are loaded here at truck dock

1113 hrs. Photograph 8 (south) Photo of baghouse #5. Cracks in concrete. Baghouse dust on open area (soil) next to baghouse collection area. Concrete is not epoxy lined. Visible baghouse dust (coarse gray color). See Photo 8

KEW 12/11/93

Photograph 9 (southwest) Photo of former DSA. Only used to store empty drums. Empty drums presently stored inside on concrete. Not [illegible] lined. No berm. Outside recyclable materials was stored here - No visible stain here. No haz. waste stored here. Not a SWMU

Photograph 10 (west-southwest) Photo of the former Haz. Waste DSA. Asphalt lined pad. Few stains on asphalt. No cracks. No berm. Soil (unpaved) abutts this area. Area that abutts the Haz. Waste Area is clean, no sign of release is evident.

KEW 12/11/93

1128 hrs. AST 5,000 gallon tank used to store WWTP sludge (D008). Called a dewatering / holding tank for the sludge. Held material over 90 days several times. [sent to Environ In Harvey]

1130 hrs. Photograph [illegible] (South-southwest) photo of former WWTP building tank area which stored WWTP sludge (D008). Staining present. No cracks in concrete. No epoxy lining. No fire suppression present. Open troughs lead to WWTP water collector. In background 03 filter press & WWTP sludge collection drum. KEW Annual generation was ~~450~~ about 5000

KEW 12/17/13

gallons per every 45 days. Current WWTP sludge is reclaimed by smelters. Minimal lead content is less than 10%.

1140 hrs Soda Ash waste is mixed with the leaded trash & floor sweepings.

1146 hrs. Brad Farnsley leaves

1147 hrs Into QC lab. Conducts acetic acid, fire & testing of bottom pot and lead is done here. No waste stored except in quantities of less than 1 gallon & is usually moved to the Haz. waste storage area each day.

1153 hrs. Went into Wilberthy [illegible] area, & lead bars and bases, bullion are repaired here

KEW 12/17/13

1153 hrs Photograph 12 (view SW) photo of 2 UST areas 8,000 gallons & 550 gallon gas tanks

1154 hrs. Photographs 13 & 14 (view) of former 550 gallon UST containing gas. No closure yet. Visible signs of petroleum products found. Location of 3rd UST is unknown. When plant expansion was done it was removed. Filled in place w/ gravel prior to 1987. 8,000 gallon UST was removed.

1204 hrs Maintenance garage
Used Oil picked up by Texamo, Inc.
2-75 gallons tank of used oil
KEW 12/17/03

are stored phone #708/366.0440
Parts cleaner product:
Texamo, Inc may pick this up. Monthly generated is 150 gallons every 2 to 3 months
1208 hrs Photograph 15 (SW) Photo of 2-275 gallon used oil tanks.
Concrete pad, No containment or berm No stains, Cracks in concrete. Vent pipe in top.
Transporter is Parrish Carriers, Inc. 1-800-486-3885
Age of used oil tanks - age is unknown. Average number per working days is 9500 X 250 days = 2,375,000 per year
1217 hrs. END VSI - Return to Conference Room. ~~About 10,000 to 9500 batteries are produced each day.~~ KW
KEW 12/17/03

Discuss VSI, No questions
by Johnson. Warehouse stores 500,000 batteries
1228 hrs leave facility

End of Page & U5X
[illegible] E. Whitten 12/17/93

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[illegible] Whitten 12/17/93

Field Logbook No. _____ Date 12/17/93

Project No. _____

Project Name Johnson Controls, Inc.

940 Boundary Facilities
- RR - South
- Marshy Area directly east ~~to Northeast~~ of
- E & T Glass and Mirror, Vacant lot, Allied Tubular Rivet, Inc. - North, on Commerce Drive.
- Miner Enterprises, Inc.; Northeast on 38
- South of Tracks - Landfill, Kane County Events Center.

Glen Garry Dr.

84

Field Logbook No. _____ Date 12/17/93

Project No. _____

Project Name Johnson Controls, Inc.

955 Arrive on site
Johnson Controls
ILD 708 552 - 476
Jordan S. Harwood
Pat Talano
Bradley M. Fearnley

PRC:
Kurt Whitman
Keith Fiszcz

Weather - overcast, ~35°F, rain, heavy fog.

Kurt Explains purpose of VSI.

Facility ~250,000 ft²

85

Field Logbook No. _____ Date 12/17/93

Project No. _____

Project Name Johnson Control, Inc.

UST Removed Oct 93
8,000 gal - diesel fuel,
steel, past leak
test in prior year,
installed in 1978.
Contaminated soil found
under the pump.
visible cont.

had 3 USTs, all gone
now.

Lead Comes in
2000 lb hogs
60 lb pigs

KJ

Field Logbook No. _____ Date 12/17/93

Project No. _____

Project Name JCI

discuss schematic given,
wastes
dropped paste
unusable grids - smelter
floor sweepings
baghouse dust } go to smelter
pipe } Doe Run Boss, Mo.
sludge } Gopher smelting or
lead dross } RSR in Indiana
COS flux - aqueous hydrobrome
solution - Clean Harbors, KY
used for cleaning/etching
straps before welding.
1 to 2 drums per mo.
acetic acid

Field Logbook No. _____ Date 12/17/93

Project No. _____

Project Name JCI

~~leaded waste~~ kit 5 drums/wk
WW treatment sludges
leaded waste -
160 drums of waste go
to smelter per week

All other supplies are
purchased, poly cones
prepared, acids etc.

operations only include
lead melt, and lead
oxide production.

Began operation in 1961
-- 81 Johnson bought
Globe.

KM

Field Logbook No. _____ Date 12/17/93

Project No. _____

Project Name JCI

Four groups of Johnson Control, Inc.
Controls
Automobile Systems
Battery
Plastec Technology

Air Permits -
no odor complaints or
violations.

employees - 340, 3 shift
5 days/wk

Completely fenced,
security guards, cameras

16.5 acres.

KM

Field Logbook No. _____ Date 12/17/93

Project No. _____

Project Name JCI

acid received in bulk
NAOH - bulk 20% sol
Epoxy - 55 gal
Flux - "

USed oil

Parts washer - one in
maintenance shop by
SK.

Former drum Strage Area
- concrete slab

WWT -
all plant process ww,
rinse waters, blowdown
from washing machines,

Field Logbook No. _____ Date 12/17/93

Project No. _____

Project Name JCI

overflow from cooling towers,
45,000 gal/day,
neutralize, floce, coag-
ulation, sedimentation.
filter press for sludge.
Size:
40' by 50' built in 1977

No recollection of spills
or releases.

All floor drains go to
WWT

Separate storm water sewer
for roof drains

Field Logbook No. _____ Date 12/17/93

Project No. _____

Project Name JCI

1025 Tour
lead storage
plastic

maintence
petroleum based solvent
managed in sltc,
10 gal/yr.

Photo 1 Dross SMA
North

3 baghouses on side,
& roof systems go to
outside systems

KJ7 92

Field Logbook No. _____ Date 12/17/93

Project No. _____

Project Name JCI

photo 2 North - dross hopper
grid casting systems
6 in facility

Drum storage area
Photo 3 - NW -
200 drums, "fiasco"
drums in good condition

Photo 4 - SW - Haz W.
8 - 55 gal drums - D008
2 - 15 gal drums. ~~F001/F7~~ ~~D008~~

mill, lead - F001, D008 11/15/93
Flux - D002, D004, D007
D008 12/3/93

started in Oct 93 as Haz W
storage area

93 KJ7

Field Logbook No. ______ Date 12/17/93

Project No. ______

Project Name JCI

North Photo 5
Rotocone -
drum on concrete.
in operation, dust on
floor, 15 years old.

photo 6 North
Recovery system for paste
6" high containment, clean,
sump, drum filter
removes solids deposits
into a drum for smelter.
water from ~~sludge~~ filter press
gets reused as wash.
all paste from operations go
into a sump and delivered
to the ~~above~~ area, and
pumped into the tanks shown.

KH

Field Logbook No. ______ Date 12/17/93

Project No. ______

Project Name JCI

photo 7 North - trailer.
drums that go to smelter,
dock has sump that
gets pumped onto the
drive way

photo 8 South
Baghouse #5,
full drums go directly into
trailer, concrete kept
clean, material present
on soil around concrete,
cracked.

photo 9 South East,
RSA, stored on pallets
concrete cracked, 1960-?

KH

Field Logbook No. _____ Date 12/17/93

Project No. _____

Project Name JCI

photo 10' west
Hazardous Storage area,
asphalt area,
1991 one year only.

Settlers Hill Landfill -
owned - Chem Waste

Residence - immediate
west.

WWT plant
fiberglass tanks, sumps
troughs lead back to main
collection area, floor clean/
dry.
5,000 gallon sludge tank
IEPA want the JCI to RCRA

96

Field Logbook No. _____ Date 12/17/93

Project No. _____

Project Name JCI

close.
photo 11 South, former
5,000 gal tank, and
sludge press, 2 drums
go directly to trailer
for smelter,
previous sludge (2008) to Envirite,
5,000 gal/45 days,

8 - fiberglass tanks of acid
3500 gal

QC laboratory
free lead tests in
barton mill pot.
acetic acid waste brought
to Storage area in small
containers and transferred into.

97

Field Logbook No. _____ Date 12/17/93

Project No. _____

Project Name JCI

photo 12 South - Former
UST 8,000

photo 13, 14 Northwest, former
UST 550+ vent pipe

3rd UST location not found,
prior to 1982 filled in place
w/ gravel - 8,000 gal.

Used oil -
Texaroma pick up oil
708 366 0440
2 - 75 gal tanks
150 gals / 2-3 months

Field Logbook No. _____ Date 12/17/93

Project No. _____

Project Name JCI

photo 15 southwest
2 - 75 gal tanks, used
oil, std, concrete
stained.

transporter of lead
waste
Parish Carnes
800 / 486-3885
[Sharon]

2.5 million batteries / year

1215 End Tour
Hold exit meeting

Exit Facility 1235

KJA

Field Logbook No. _____ Date 12/17/93

Project No. _____

Project Name JCI

photo 12 South - Former UST 8,000

photo 13, 14 Northwest, former UST 550+ vent pipe

3rd UST location not found, prior to 1982 filled in place w/ gravel - 8,000 gal.

Used Oil -
Texoma picks up oil
708 366 0440
2 - 75 gal tanks
150 gals / 2-3 months

98

Field Logbook No. _____ Date 12/17/93

Project No. _____

Project Name JCI

photo 15 southwest
2-75 gal tanks, used oil, steel, concrete stained.

transporter of lead waste
Parish Carnes
800 / 486-3885
[Sharon]

2.5 million batteries/year

1215 End Tour
Hold exit meeting

Exit Facility 1235

99

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5
77 WEST JACKSON BOULEVARD
CHICAGO, IL 60604-3590

REPLY TO THE ATTENTION OF:

HRE-8J

December 7, 1993

Mr. Pat Talano, Process Engineer
Johnson Controls Battery Group, Inc.
300 South Glengarry Avenue
Geneva, IL 60134

Re: Visual Site Inspection
Johnson Controls Battery Group, Inc.
300 South Glengarry Avenue
Geneva, IL 60134
ILD 980 502 470

Dear Mr. Talano:

The United States Environmental Protection Agency (U.S. EPA) Region V will conduct a Preliminary Assessment including a Visual Site Inspection (PA/VSI) at the referenced facility. This inspection is conducted pursuant to the Resource Conservation and Recovery Act, as amended (RCRA) Section 3007 and the Comprehensive Environmental Response, Compensation, and Liability Act, as amended (CERCLA) Section 104(e). The referenced facility has generated, treated, stored, or disposed of hazardous waste subject to RCRA. The PA/VSI requires identification and systematic review of all solid waste streams at the facility. The objective of the PA/VSI is to determine whether or not releases of hazardous wastes or hazardous constituents have occurred or are occurring at the facility which may require further investigation. This analysis will also provide information to establish priorities for addressing any confirmed releases.

The visual site inspection of your facility is to verify the location of all solid waste management units (SWMUs) and areas of concern (AOCs) to make a cursory determination of their condition by visual observation. The definitions of SWMUs and AOCs are included in Attachment I. The VSI supplements and updates data gathered during a preliminary file review. During this site inspection, no samples will be taken. A sampling visit to ascertain if releases of hazardous waste or constituents have occurred may be required at a later date.

Assistance of some of your personnel may be required in reviewing solid waste flow(s) or previous disposal practices. The site inspection is to provide a technical understanding of the present and past waste flows and handling, treatment, storage, and disposal practices. Photographs of the facility are necessary to document the condition of the units at the facility and the waste management practices used.

The VSI has been scheduled for 9:00 am on December 16, 1993. The inspection team will consist of Kurt Whitman and Keith Foszcz of PRC Environmental Management, Inc., a contractor for the U.S. EPA.

Representatives of the Illinois Environmental Protection Agency (IEPA) may also be present. Your cooperation in admitting and assisting them while on site is appreciated.

The U.S. EPA recommends that personnel who are familiar with present and past manufacturing and waste management activities be available during the VSI. Access to any relevant maps, diagrams, hydrogeologic reports, environmental assessment reports, sampling data sheets, environmental permits (air, NPDES), manifests and/or correspondence is also necessary, as such information is needed to complete the PA/VSI.

If you have any questions, please contact me at (312) 886-4448 or Francene Harris at (312) 886-2884. A copy of the Preliminary Assessment/Visual Site Inspection Report, excluding the conclusions and Executive Summary portion will be sent when the report is available.

Sincerely yours,

Francene M. Harris for

Kevin M. Pierard, Chief
OH/MN Technical Enforcement Section

Enclosure

cc: Larry Eastep, IEPA
Jordan Harwood, Johnson Controls